

# Regional Fair Housing and Equity Assessment (RFHEA) 2025

DRAFT

Clark County  
City of Las Vegas  
City of Henderson  
City of North Las Vegas  
City of Boulder City  
City of Mesquite

## HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

**Silver State Fair Housing Council:** A private, nonprofit agency providing a comprehensive program of fair housing outreach, education, and enforcement services.

(888) 585-8634 toll-free/(702) 749-3288 Southern Nevada

Relay Nevada 711

Website: [www.ssfhc.org](http://www.ssfhc.org)

Email: [fairhousing@ssfhc.org](mailto:fairhousing@ssfhc.org)

**Nevada Equal Rights Commission:** State agency enforcing state fair housing laws; receives and investigates bona fide claims of housing discrimination.

(702) 486-7161 Southern Nevada

NV Relay 711 or (800) 326-6868

Website: [www.nvdetr.org/nerc.htm](http://www.nvdetr.org/nerc.htm)

**U.S. Department of Housing and Urban Development:** Regional Office in San Francisco Federal agency enforcing the federal Fair Housing Act; receives and investigates bona fide claims of housing discrimination.

(800) 347-3739

(415) 489-6564 TTY

Website: [www.portal.hud.gov/hudportal/HUD](http://www.portal.hud.gov/hudportal/HUD)



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## EXECUTIVE SUMMARY

This Regional Fair Housing and Equity Assessment (RFHEA) helps to meet the obligation to affirmatively further fair housing, which is a requirement of recipients of funding from the US Department of Housing and Urban Development (HUD). Clark County and the cities of Boulder City, Henderson, Las Vegas, North Las Vegas, and Mesquite (collectively, the Jurisdictions) have collaborated on this RFHEA to meet this requirement. HUD suggests that an analysis of impediments be conducted every five years, preferably in conjunction with a five-year Consolidated Plan process.

This RFHEA provides an overview of laws, regulations, conditions, and other possible obstacles that may affect an individual's or household's access to housing.

- A comprehensive review of laws, regulations, and administrative policies, procedures, and practices, and an assessment of how they affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

The Jurisdictions completed its previous Analysis of Impediments to Fair Housing in 2020 with a set of action steps it planned to carry out over the next five years. It should be noted that the City's ability to carry out those action steps were impacted by the global COVID-19 pandemic, which was first diagnosed in the United States in January 2020. During this time, states of emergency were declared and the federal and state governments enacted safety measures such as shutting down large gathering places and limiting the movement of residents. These restrictions remained in place in varying degrees over the years following the initial outbreaking the United States and resulted in significant impacts on the economy, particularly on the housing market and socio-economic indicators. These impacts are still seen today as discussed throughout this plan.

### Definitions

Below are terms frequently used throughout this report:

**Affirmatively Further Fair Housing** means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means addressing significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. See 24 CFR § 5.151

**Protected Characteristics** are defined at the Federal and State levels and are discussed in Section IV of this report.

**Racially/Ethnically Concentrated Area of Poverty (R/ECAP)** is a neighborhood (census tract) that has a poverty rate of 40 percent or more and a racial or ethnic concentration where 50 percent or more of the tract is composed of minority residents.

## Background on Fair Housing Planning Requirements

For decades, HUD has required participants of HUD programs, such as states, local governments, insular areas, and public housing authorities (PHAs), to engage in Fair Housing Planning. Such planning has previously consisted of the Analysis of Impediments to Fair Housing Choice (AI) and the Assessment of Fair Housing (AFH) and was done in connection with other types of planning required by program requirements, such as the consolidated plan, annual action plan, and PHA plan.

On February 9, 2023, HUD published in the Federal Register a [Notice of Proposed Rulemaking \(NPRM\) entitled “Affirmatively Furthering Fair Housing.”](#) Comments on the rule were accepted through April 2023, however, that rule was withdrawn in January 2025. In the absence of a new rule, HUD’s 2021 Interim Final Rule (IFR) remains in effect until further notice.

HUD’s 2021 Interim Final Rule, “Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,” requires program participants to submit certifications that they will affirmatively further fair housing in connection with their consolidated plans, annual action plans, and PHA plans. In order to support these certifications, the IFR creates a voluntary fair housing planning process for which HUD will provide technical assistance and support.

The IFR also rescinded the 2020 Preserving Communities and Neighborhood Choice rule, which caused program participants to certify “compliance” with a regulatory definition that is not a reasonable construction of the Fair Housing Act’s mandate to affirmatively further fair housing. With the IFR, HUD put itself and its program participants back in a position to take meaningful steps towards improved fair housing outcomes. The IFR does not require program participants to undertake any specific type of fair housing planning to support their certifications.

HUD implements the AFFH mandate in other ways, such as through its collection of certifications from program participants, provisions regarding program design in its notices of funding opportunity (NOFOs), affirmative fair housing marketing and advertising requirements, and enforcement of site and neighborhood standards.

## Understanding Fair Housing and Impediments to Fair Housing

In light of the various pieces of fair housing legislation passed at the Federal and State levels, fair housing throughout this report incorporates the concept of fair housing choice and means:

A condition in which individuals of similar income levels in the same housing market have a range of choices available to them regardless of their characteristics as protected under State and Federal laws.

HUD's Office of Fair Housing and Equal Opportunity (FHEO) draws a distinction between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments is where fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

Within the legal framework of Federal and State laws, and based on the guidance provided by HUD's Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, which restrict housing choices or the availability of housing choices; or any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of characteristics protected under State and Federal laws.
- To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice.

## Methodology

The following steps were taken to update the report:

- Analyze current publicly available data regarding the demographics and housing;
- Engage with community members and stakeholders via public meetings and correspondence;
- Identify impediments to fair housing choice for residents; and
- Develop strategies and actions for removing impediments and affirmatively furthering fair housing choice.
- Analysis of demographic and housing trends was completed using data from numerous sources, including the US Census Bureau's 2000, 2010, and 2020 Decennial Census data, American Community Survey (ACS) 2018 – 2022 and 2023 data, Housing Mortgage Disclosure Act Data from 2023 and other sources identified throughout the plan. The most current data sources available at the time of drafting this report were used, however, gaps in collection, publication, and analysis of data from the primary sources have presented challenges in the current landscape of rapidly changing housing costs and inflation. These lags have resulted in differences between information presented in the data and the current experiences described in consultation with the community. Where possible, additional data sources are used to provide context of current challenges.

The community engagement process involved three stakeholder meetings and interviews as well as a digital survey. Engagement materials were distributed to service organizations who then distributed it to their served populations. Residents were highlighted for engagement, including: racial and ethnic minorities, people experiencing homelessness, people with disabilities, and people with limited English proficiency.

Stakeholders from a variety of organizations were contacted as well, including organizations that provide housing, housing services, homeless services, nonprofit social services, services for seniors, services for disabled persons, and HIV/AIDS services, as well as government agencies, advocates, emergency service providers, educational organizations, and economic development organizations.

The Community Engagement Process is further discussed in Chapter 8 on Community Outreach.

## Overview of Findings

This RFHEA includes a review of both public and private sector housing market contexts within the jurisdictions to identify practices or conditions that may operate to limit fair housing choice in the region. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the Southern Nevada residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, studies, complaints, and public involvement data. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available to residents, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice. Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes and confirm suspected findings from the contextual and supporting data.

The following findings were made.

### Demographics

- The population of Clark County has increased over 16% since 2010, outpacing the rate of growth in the State (around 15%) and the country (around 7%). The City of Las Vegas has grown by over 10%, North Las Vegas by nearly 22%, Henderson by over 23% and Mesquite by over 35%. Only Boulder City has decrease in population by around 1%.



- The Center for Business and Economic Research at the University of Nevada, Las Vegas predicts that Clark County will continue to see significant growth for the next 20 years. However, the growth rate will steadily decrease annually.
- Overall, the median age of the jurisdictions is increasing with the highest increases in median age in Mesquite and North Las Vegas.
- Since 2010, the non-White population has grown in every jurisdiction with the White population decreasing by about 8% since 2010. The City of Boulder City, which also has one of the oldest populations, has the most homogenous population, over 88% of the population is White. The City of North Las Vegas, which has been trending towards a younger population, is the most diverse with 61.9% of the population identifying as non-White.
- The fastest growing demographic is the Hispanic population, which has grown throughout the area. The number of Hispanic people in the County overall has grown by nearly 28% since 2010. It has grown by about 20% in Las Vegas, 32% in North Las Vegas, 58% in Henderson, 28% in Boulder City, and 43% in Mesquite.
- Since 2010, nearly every jurisdiction has seen the proportion of their population that is foreign-born grow. The population of foreign born has reduced in Boulder City. Henderson County has seen the largest growth in foreign born persons.
- The number of households who speak a language other than English at home is very similar to the number of foreign-born households. The most common language spoken at home is Spanish, which is spoken by 19.3% of households in Nevada. It is also relatively common for a household to speak an Asian or Pacific Islander language in Clark County.
- In Clark County, the disability rate by age is similar to the rate in the state, as a whole. Nearly 50% of residents over 75 years and over have a disability. This elderly population is likely on a fixed income and may need support to maintain or secure safe and stable housing.
- Since 2010, Nevada and the Clark County area have both seen median incomes rise, however, these increases are not keeping pace with rising home values and rents. Currently, the City of Henderson has the highest MHI by nearly \$14,000. Mesquite has had the most increase in MHI.
- The current poverty rate and change in poverty rate since 2000 varies between jurisdictions. The State's overall poverty rate in 2022 is 12.7%. Clark County's poverty rate is 13.4%. Las Vegas' poverty rate is 14.7%. NorthLas Vegas, Boulder City, Mesquite, and Henderson all have poverty rates below the County rate ranging from 11.9% down to 8.1%. The City of North Las Vegas' poverty rate grew by only 2%, however, they had the highest poverty rate in 2000 and currently have the second highest. The City of Boulder City had the greatest increase in poverty rate (65.7%) but still maintains one of the lowest poverty rates in the area.
- White households across all jurisdictions have the lowest poverty rates while Black/African American and American Indian/Alaskan Native households have the highest.
- A noticeable difference is seen in the household composition across jurisdictions. The City of Mesquite has the lowest average household size at 2.25 while North Las Vegas has the highest at 3.31. This trend is due to the younger demographics in North Las Vegas, which

may include families, while the older residents of Mesquite are less likely to have children still living at home. Across all jurisdictions, however, households are less likely to include children than they were in 2010

- For all jurisdictions compared, the homeownership rate has decreased since 2010 except for Boulder City and Mesquite. The City of Las Vegas has the highest rental rate at 45.2% while Mesquite has the lowest at 21.3%.
- Throughout Clark County, Black or African American and Native Hawaiian/Pacific Islander residents have lower homeownership rates than other racial or ethnic groups. White and Asian residents consistently have higher rates of homeownership. Mesquite stands out for the high homeownership rate among White residents and low rate among all other groups.

## **Housing**

- The most common housing type in Clark County is the 1-unit, detached structure and make up nearly 60% of the current housing stock.
- Although housing units with 5 rooms have decreased in percentage, the total number has increased since 2017 and is still the most common housing unit size in the county with 19.5%.
- 2018-2022 ACS data reports that only about 18.3% of all housing units in Clark County were built prior to 1980.
- 2-person households have remained the most common household size since 2000 and was 33.1% of households by 2023.
- The vacancy rate in Clark County saw a decrease of -8% between 2017 and 2023, following the approximately 6% increase seen between 2020 and 2017
- Clark County's median home value rose by 73.7% between 2017 and 2023.
  - North Las Vegas had the largest increase in median home value at 89.3%.
- Clark County's median contract rent rose by 56.4% between 2017 and 2023.
- 24.94% of homeowner households are cost burdened and 10.72% are severely cost burdened.
- 51.39% of renter households are cost burdened and 25.65% are severely cost burdened.

## **Lending Analysis**

- Between 2018 and 2023, loan applications peaked in 2021 with 292,296, up from 144,573 in 2018. Loan application rates trended downward from 2021 to their lowest levels in the five-year period in 2023 with 85,256 applications.
- Much of the year-to-year fluctuations in total originations that occurred between 2018 and 2023 were the result of refinancing originations. Refinancing was the dominant loan for all years examined with the exceptions of 2022 and 2023. Refinance loans grew significantly between 2018 and 2021 as interest rates were broadly low. In 2021 the US 30 YR conventional loans were around 3% and gradually increased to 7% in mid-2023.
- In 2023, 48% of applications were approved and 34% were denied. Primary reasons for denial included debt-to-income ratio (37%), Credit History (23%) and Collateral (13%).

- The largest applicant groups in 2023 for traditional home mortgages were Other Race (31%) and White (31%). Hispanic applicants represented 18% of the overall applicant pool. Black/African American applicants represented 6.7% of all home purchase applications. White applicants were least likely to be denied for conventional single-family home purchases at a rate of 17%, followed by Asian applicants at 21%. Black/African American and Hispanic applicant denial rate were highest at 23% respectively.
- Between 2018 and 2023, White and Asian applicants were less likely to be denied relative to Black and Hispanic applicants. Additionally, Black and Hispanic applicants were the most likely to be denied relative to other groups for all years analyzed. In addition to the overall denial rate, this pattern is evident in both home purchase and refinance loans, however, the widest differences were seen in home purchase loans.
- The denials across all income groups have risen since 2022 due to higher interest rates and stagnant wages. However, the percentage of denials by income group has risen more drastically for very low-income applicants (50% or less of Area Median Income). While the high-income group denial rate changed from 14.67% to 15.88% from 2022 to 2023, the very low-income group denial rate increased from 32.98% to 42.29%.
- Within Clark County, very low-income and low-income neighborhoods represent 19.87% of the County's total neighborhoods, although they are represented by approximately 4.66% of total originations and 7% of applications as of 2023. This suggests that low and very low-income neighborhoods within the County are less likely to participate in the single-family lending market relative to other neighborhoods.
- Across incomes, disparities can be seen in approvals by race. In 2023, the denial rate for high income Black applicants was 11.03% or roughly the same as that of low-income White applicants at 11.69% and moderate-income Asian applicants at 11.34%.
- As of 2023, the leading denial reason for all applicants across all income groups was Debt-to-Income Ratio and Credit History.
- Subprime loans have steadily increased between 2018 – 2023 with White and Hispanic loan seekers more likely to engage in the subprime lending market.

## Overview of Impediments to Fair Housing and Actions

Based on the findings above, the following impediments and actions were determined. Further detail is provided in Chapter 9.

**GOAL ONE: PROMOTE FAIR HOUSING ENFORCEMENT AND EDUCATION THROUGH INTERAGENCY COLLABORATION.**

**IMPEDIMENTS ADDRESSED:**

- *Barriers to accessing housing opportunities exist for those with credit history, eviction history, and criminal background concerns.*
- *Residents, homebuyers, and landlords have insufficient understanding of fair housing requirements and protections.*
- *Navigating resources and affordable housing options is challenging and prevents residents from accessing housing opportunities.*
- *Coordinated approaches are needed to address the housing affordability concerns in the County.*

**ACTION 1A:**

Continue to contract with housing service providers to educate home seekers, landlords, property managers, real estate agents, and lenders through trainings and material development regarding fair housing law and recommended practices, including the importance of reasonable accommodation under ADA, protections for protected classes, and the impact of using credit, criminal, and eviction history to assess tenant applications.

**ACTION 1B:**

Explore the creation of tenant advocacy materials that will provide easy to understand summaries of tenant rights and information on resources that can help with housing challenges including where to find housing assistance, where to report housing concerns, and how to manage background checks that may result in rental application rejection. These materials should be available in multiple languages as well as digitally and on paper for those who do not regularly access the internet.

**ACTION 1C:**

Seek ways to increase resident access to fair housing services, such as improved marketing of services, strategies for bringing opportunities into the community through partnership with service organizations and incorporating fair housing considerations as a routine practice of program administration.

## GOAL TWO: CONTINUE TO SUPPORT THE CREATION OF NEW AFFORDABLE HOUSING OPPORTUNITIES

### IMPEDIMENTS ADDRESSED:

- *The region lacks the number of affordable housing units needed to meet the demands of low to moderate income households.*
- *Increasing rent costs are pushing residents out of communities where they wish to live and where they have connections to support systems and opportunity.*
- *Property turnover is resulting in displacement of residents and high costs of housing leave few options for accessing new housing that is safe, decent, affordable, and near opportunity areas.*

### ACTION 2A:

Continue to encourage construction and rehabilitation of affordable housing throughout the region, for example through the use of public land and enhanced coordination with nonprofit developers.

### ACTION 2B:

Encourage landlords in high resource areas to market their available units to Housing Choice Voucher Holders through education, incentives, and interagency coordination that may help to streamline housing navigation.

### ACTION 2C:

Explore the promotion of new housing strategies to create new opportunities and enhance affordable housing preservation efforts, for example through the use of accessory dwelling units, adaptive reuse, employer-assisted housing, land trusts, etc.

### ACTION 2D:

Continue to provide and explore additional incentives for developers of affordable housing including incentives such as reduced fees, expedited processing, and regulatory streamlining.

### ACTION 2E:

Explore incentive opportunities for landlords willing to participate in affordable housing programs to expand available rental units.

**GOAL THREE: PROMOTE ASSISTANCE FOR THOSE FACING HOUSING INSTABILITY OR AT RISK OF HOMELESSNESS**

**IMPEDIMENTS ADDRESSED:**

- *Increasing rent costs are pushing residents out of communities where they wish to live and where they have connections to support systems and opportunity.*
- *Property turnover is resulting in displacement of residents and high costs of housing leave few options for accessing new housing that is safe, decent, affordable, and near opportunity areas.*
- *Eviction law in Nevada favors landlords and those who are evicted face greater challenges in securing new housing in the current market.*

**ACTION 3A:**

Explore ways to coordinate with local service providers to connect people at risk of eviction or displacement with services that stabilize housing.

**ACTION 3B:**

Monitor the status of affordable housing units at risk of conversion and work proactively with property owners to identify strategies that will allow units to remain affordable to prevent turnover and decrease in affordable housing stock.

**ACTION 3C:**

Explore expansion of programs that support low-income and senior homeowners in the maintenance of their homes and long-term sustainability of homeownership to avoid displacement, for example through programs that may include homeowner repair or assistance with mortgage payments, real estate taxes, homeownership association fees, and homeowner's insurance.

**ACTION 3D:**

Coordinate with the social service agencies and nonprofit partners to provide support for programs that provide tenant rental assistance, such as rent support, utility payments, and late fees, including for those facing the greatest housing instability (e.g. those on fixed incomes and those exiting facilities of care or incarceration.)

#### GOAL FOUR: EXPAND HOUSING OPPORTUNITIES FOR PEOPLE WITH SPECIAL NEEDS

##### IMPEDIMENTS ADDRESSED:

- *The region lacks the accessible units and supportive housing units needed to meet the demands of special needs households.*
- *Increasing rent costs have disparate impacts on special needs households that tend to have fixed incomes and fewer options for housing that accommodates their needs.*

##### ACTION 4A:

Provide accessibility improvements in rehabilitation activities to increase opportunities for people with physical disabilities to obtain and retain appropriate housing and live independently.

##### ACTION 4B:

Facilitate housing development and assistance programs for special needs households, including seniors, working families, persons with disabilities, and the unhoused.

#### GOAL FIVE: CONTINUE TO SUPPORT THE CREATION OF NEW AFFORDABLE HOUSING OPPORTUNITIES

##### IMPEDIMENTS ADDRESSED:

- *Lending patterns show that low-income communities and communities of color, even those with high incomes, are more likely to be rejected for home loans.*
- *Lack of economic mobility further intensifies increasing housing cost burden, particularly for renters.*

##### ACTION 5A:

Support activities that improve access to economic opportunities for low-income families and children.

##### ACTION 5B:

Provide services or support agencies that provide assistance to those exiting homelessness to increase housing and economic stability, for example through transportation assistance, assistance with accessing vital documents like identification, birth certificates, and social security cards, and the referral to community services that might include provision of job training and placement.

##### ACTION 5C:

Work with local lenders to encourage outreach to low-income communities and communities of color to facilitate education and counseling for homeownership opportunities.

**ACTION 5D:**

Provide funding for low-moderate income homebuyer programs, for example through new unit subsidies and downpayment assistance.

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## CHAPTER 1. INTRODUCTION

### Purpose of the Regional Fair Housing and Equity Assessment

Like all jurisdictions that receive community development block grant funds from the U.S. Department of Housing and Urban Development (HUD), the jurisdictions covered by this analysis of impediments to fair housing—unincorporated Clark County, Boulder City, Henderson, City of Mesquite, Las Vegas, and North Las Vegas—are obligated to affirmatively further fair housing. To fulfill this long-standing obligation to foster a genuinely free market in housing that is not distorted by housing discrimination, these jurisdictions have identified, analyzed, and devised solutions to both private and public sector barriers to fair housing choice that may exist within its borders. As is the case throughout the nation, the impediments to fair housing choice are both local and regional in nature—and the approaches to mitigate them necessarily have local and regional components.

#### VISION FOR SOUTHERN NEVADA

Clark County, Boulder City, Henderson<sup>1</sup>, Las Vegas, and North Las Vegas are partners in Southern Nevada Strong, a regional planning effort with the purpose to build a foundation for long-term economic prosperity and community livelihood by better integrating transportation, housing, and job opportunities throughout Southern Nevada. The most recent RAI for Southern Nevada was completed as part of the Southern Nevada Strong Regional process in 2015.

A genuinely free market in housing undistorted by discrimination is essential to achieving this goal and reducing living costs for all Southern Nevada households. Southern Nevada Strong's regional plan, which was adopted in 2015, shows a possible future for Southern Nevada in which:

- New growth occurs in existing neighborhoods and vacant and underused sites are redeveloped.
- Multiple modes of transportation—including walking, biking and transit—are available, safe and convenient.
- More people can live close to work because jobs, services and schools are located within easy reach of a variety of housing types for all budgets and preferences.

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<sup>1</sup> The key barriers recommended to address in Henderson in the 2015 RAI included: updating the “residential facility for groups” regulations in the City’s zoning code to ensure compliance with state and federal housing laws, editing the definition of “family unit” to include community residences for people with disabilities in accordance with the Fair Housing Act and establishing a formal “reasonable accommodation” request process to afford residents with disabilities an equal opportunity to use and enjoy a dwelling.

The regional update is still ongoing to the 2015 RAI, primarily focusing on changes to the housing market and quantitative analysis. Efforts to implement the recommendations of the current RAI and promote fair housing through the creation of well-designed housing options for all Henderson residents are key priorities for Henderson planning efforts and are reflected in the City’s Strategic Plan and the Henderson Strong Comprehensive Plan.

- Underutilized retail and industrial land along key corridors is repurposed and attracts small businesses and companies in targeted economic industries.
- Redevelopment occurs along future transit corridors, including North 5th Street, Maryland Parkway, Flamingo Road and Boulder Highway.
- The region’s downtowns provide a variety of jobs and services for local residents; dense housing combined with vibrant commercial spaces; and new employment and workforce development opportunities.
- Through regional collaboration, schools are located in walkable and bikeable communities.

The Southern Nevada Strong Regional Plan identifies four main challenges facing the Southern Nevada region in realizing this vision:

- Uncoordinated Growth and Disconnected Land Uses;
- Economic Volatility and Over-Reliance on Gaming, Tourism and Construction;
- Social Disparities and Vulnerable Communities; and
- Continued Growth and Changing Demographics.

It is vital that the region has a clear understanding of the status of fair housing in Southern Nevada in order to make the changes necessary to achieve its vision. This report will identify where the region has challenges to fair housing and will make recommendations for change.

## CHAPTER 2: PAST IMPEDIMENTS

The following chart summarizes the impediments identified in the 2020 Analysis of Impediments and provides an update on actions taken.

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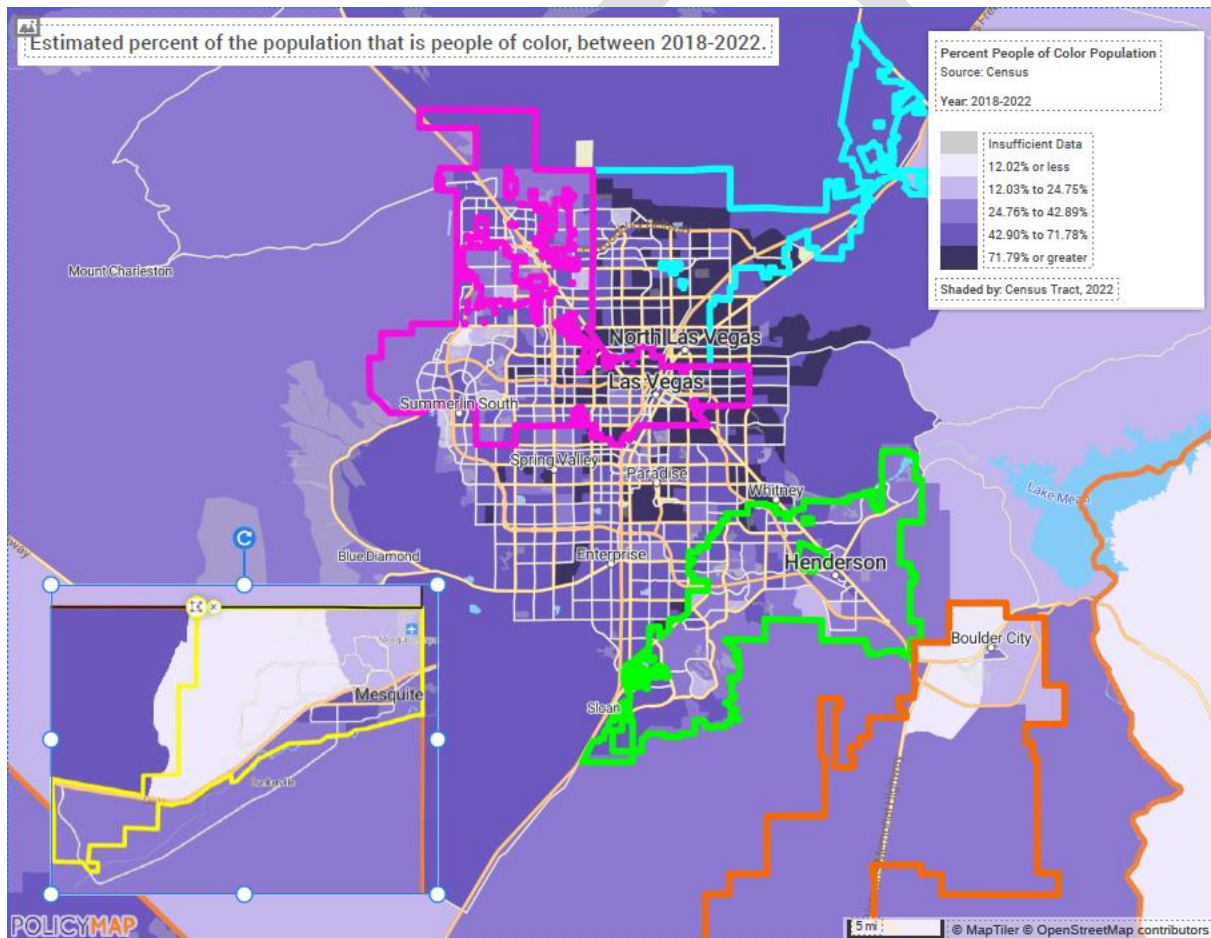
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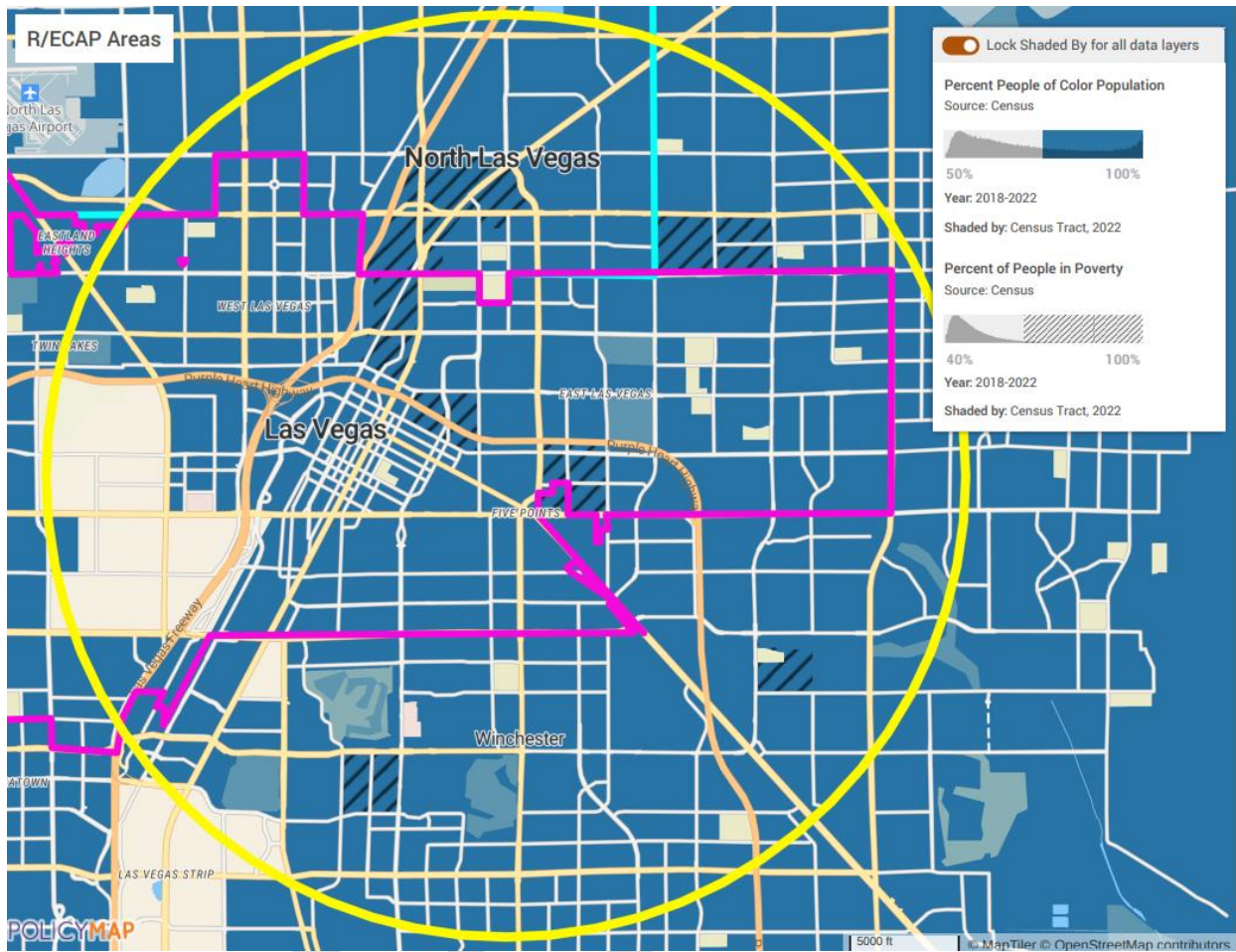
## CHAPTER 4. HOUSING STATUS

### Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)

The non-white population in Clark County in 2022 was 60.26% of the total population, which is about a 16% increase since 2017. The map below shows that Las Vegas and North Las Vegas have higher concentrations of minority residents than other areas of the County. The darkest shaded areas highlight the areas where minority concentration is over 70%.

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPS), HUD has developed a definition that involves a racial/ethnic concentration threshold and a poverty test. R/ECAPS must have a non-white population of 50% or more and census tracts must have 40% or more of people living in poverty. The map below highlights the R/ECAP areas in Clark County. These areas are shaded in blue with diagonal lines overlaying the area.





## Current Housing Conditions

### Housing Unit Type

The most common housing type in Clark County is the 1-unit, detached structure. These units make up nearly 60% of the current housing stock. The 1-unit, attached structure saw the most growth between 2018 and 2023 (1.6%). Properties with 20 or more units saw a 1.4% growth between 2018 and 2023. Building with 3-19 units, mobile homes, and boat, RV, and van home types saw a decrease in both the number of properties and the total percentages in the county.

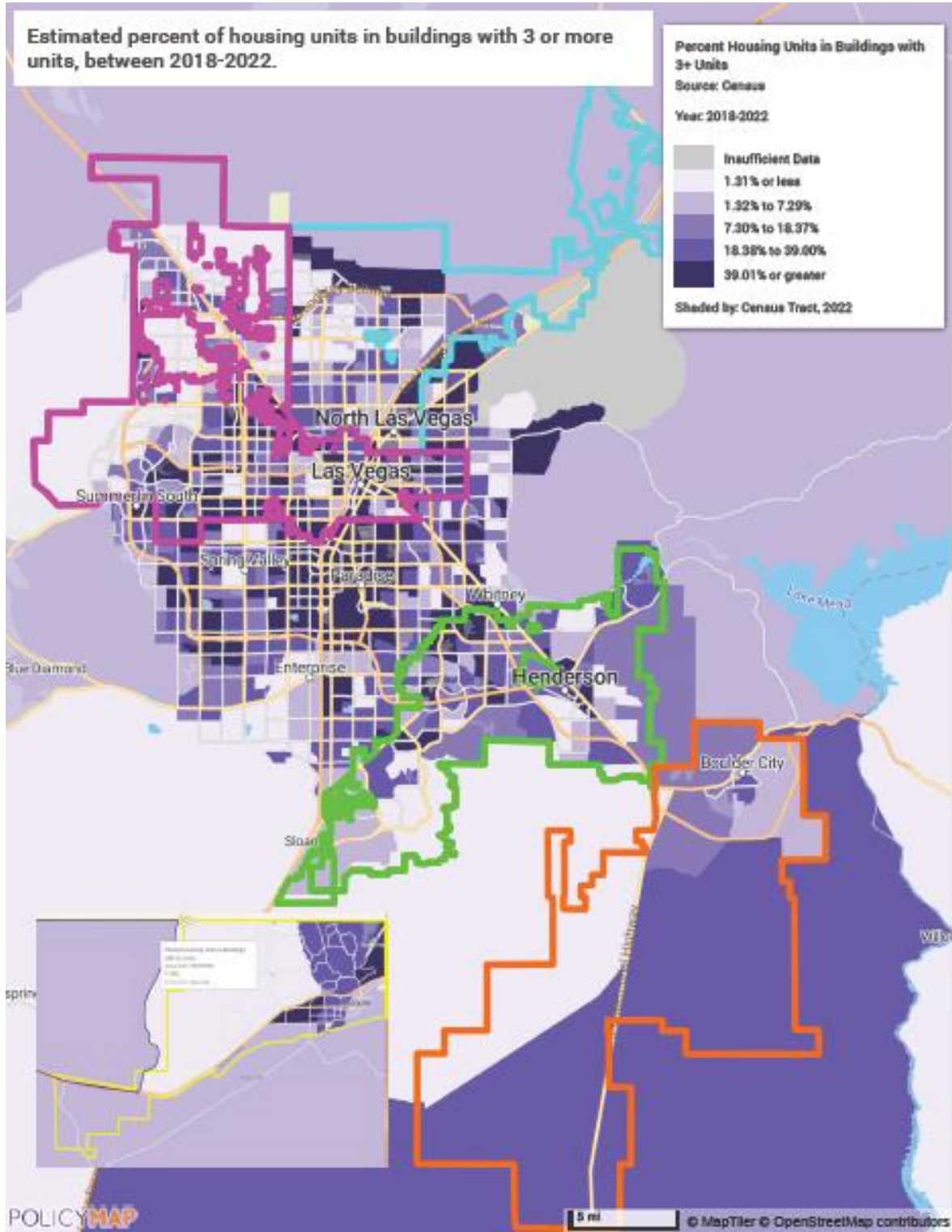
<b>Table: Properties by Type in Clark County from 2018 to 2023</b>					
<b>Type</b>	<b>2018</b>	<b>Percent</b>	<b>2023</b>	<b>Percent</b>	<b>Percent Change</b>
1-unit, detached	537,075	58.8%	577,159	59.9%	0.1%
1-unit, attached	43,272	4.7%	60,794	6.3%	1.6%
2 units	11,391	1.2%	11,255	1.2%	0.0%
3 or 4 units	64,281	7.0%	63,754	6.6%	-0.4%
5 to 9 units	77,658	8.5%	60,561	6.3%	-2.2%
10 to 19 units	56,238	6.2%	49,508	5.1%	-1.1%
20 or more units	96,541	10.6%	115,878	12.0%	1.4%
Mobile homes	26,096	2.9%	23,246	2.4%	-0.5%
Boat, RV, van, etc.	833	0.1%	1,316	0.1%	0%
Total	913,385	100%	963,471	100%	--

Source: 2018, 2023 ACS (B25024)

Multi-unit housing structures are commonplace throughout the County. The downtown areas have a higher concentration than most other areas.

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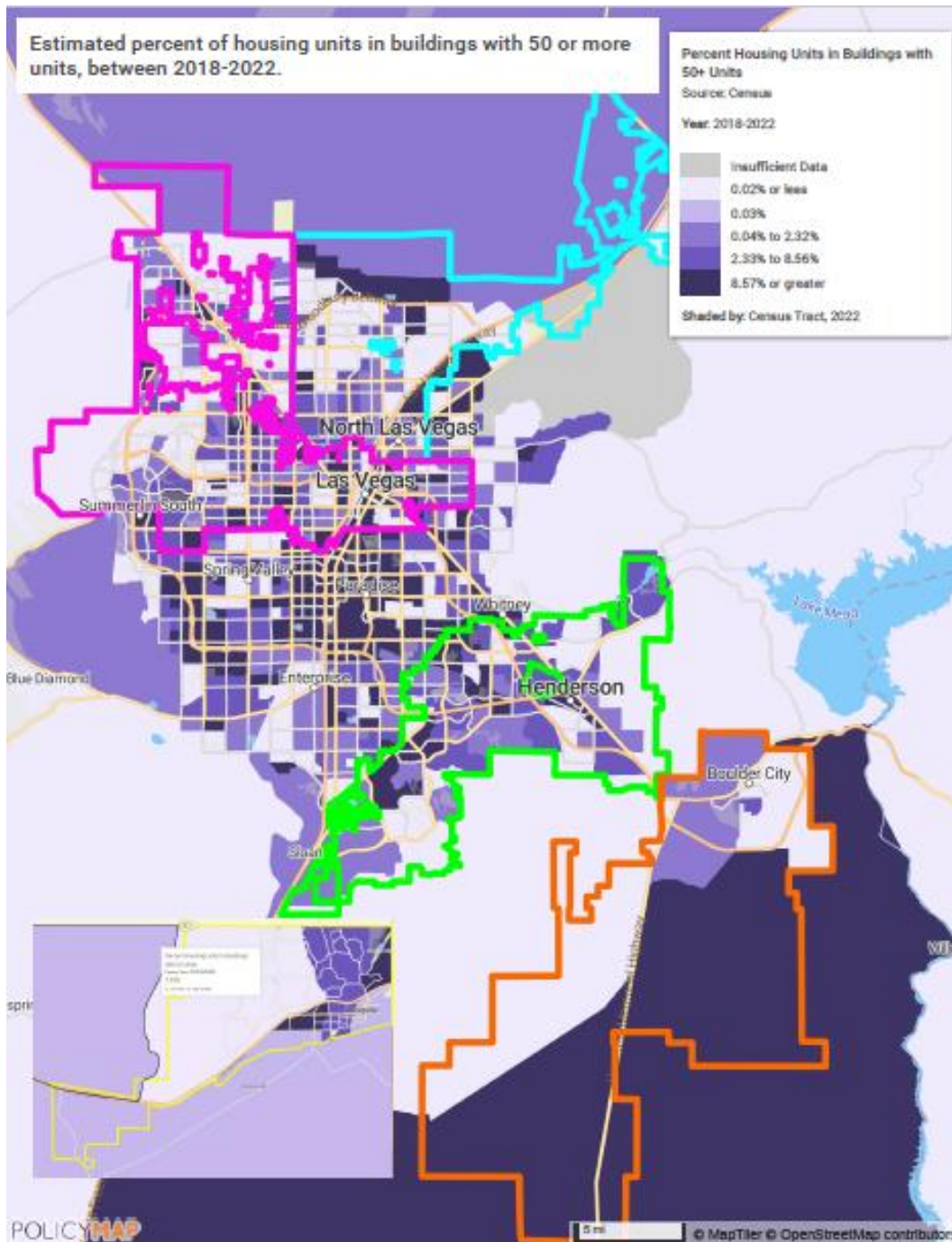
Map 4.1: Percent of Multi-Unit Housing Structures (3+ units)





Large multi-unit structures (+50 units) are uncommon in most of Clark County. They are mostly found in the downtown and central southern tracts where 20% or more of the units are in these large buildings.

**Map 4.2: Percent of Large Multi-Unit Housing Structures (50+ units)**



## Housing Unit Size

Since Between 2000 and 2017, Clark County saw a trend of increasing home sizes. Since then, smaller homes have seen increases while units with 3-5 units have all seen decreases. Although housing units with 5 rooms have decreased in percentage, the total number has increased since 2017 and is still the most common housing unit size in the county with 19.5%. Housing units with 3 bedrooms is the only household unit type that decreased in both total number and percentage between 2017 and 2023 – this type saw the largest decrease of –1.6%. Units with 8 or 9 rooms saw the largest increase between 2017 and 2023. The median number of rooms increased by 4.1% between 2020 and 2017 and has increased by another 3.9% since then.

Table: Housing Units by Size in Clark County from 2000 to 2023							
Rooms	2000	Percent	2017	Percent	2023	Percent	Percent Change (2017-2023)
1 room	19,739	3.5%	25,050	2.9%	34,186	3.5%	0.6%
2 rooms	39,653	7.1%	30,827	3.5%	40,599	4.2%	0.7%
3 rooms	71,118	12.7%	100,886	11.5%	95,571	9.9%	-1.6%
4 rooms	97,332	17.4%	164,605	18.8%	168,743	17.5%	-1.3%
5 rooms	117,914	21.1%	182,972	20.8%	187,456	19.5%	-1.3%
6 rooms	97,359	17.4%	155,691	17.7%	174,737	18.1%	0.4%
7 rooms	58,188	10.4%	95,886	10.9%	103,243	10.7%	-0.2%
8 rooms	32,644	5.8%	59,984	6.8%	77,068	8%	1.2%
9 or more rooms	25,852	4.6%	61,716	7.0%	81,868	8.5%	1.5%
Median (rooms)	4.9		5.1		5.3		3.9%

Source: 2020 Census, 2017-2023 ACS (DP04)

## Housing Conditions

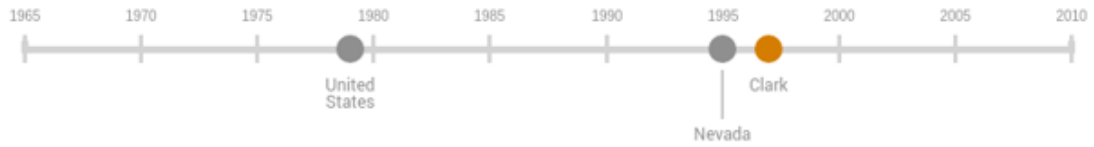
The year a house is built is heavily correlated with whether it is in substandard condition. Older homes are more likely to need regular maintenance to provide a safe and secure living environment for residents. When looking at the age of a home an important factor is whether it was built before 1978. Prior to 1978 lead-based paint was used in many homes and the presence of that paint can cause significant health problems for residents, particularly for children, the elderly, and those with compromised immune systems. Seniors or those on a fixed or limited income oftentimes cannot afford to maintain their home or to make necessary safety accommodations. As costs of materials for new builds continue to rise, rehabilitation assistance for low-income families and those on fixed incomes such as seniors and those with disabilities will be an important tool in allowing them to maintain their housing and lessen the risks of homelessness.

2018-2022 ACS data reports that only about 18.3% of all housing units in Clark County were built prior to 1980. The chart below shows the Clark County’s median year for a home being built is later than both Nevada’s and the United States’. Map 4.3 shows that the central downtown areas have older housing units compared to the surrounding areas. Map 4.4 shows reflects this, with darker shaded areas highlighting higher concentrations of housing units built prior to 1980 – most are located in Las Vegas and south of Last Vegas.

Table: Year Unit Built in Clark County and Select Cities												
Year Unit Built	Clark County		Boulder City		Mesquite		Henderson		Las Vegas		North Las Vegas	
	#	%	#	%	#	%	#	%	#	%	#	%
2020 or later	46,535	4.8%	18	0.3%	175	1.50%	8,854	6.0%	10,520	3.90%	8,828	9.10%
2010 to 2019	130,013	13.5%	160	2.3%	2,257	19.50%	26,293	17.9%	29,038	10.70%	12,858	13.20%
2000 to 2009	275,978	28.6%	734	10.4%	4,771	41.30%	43,169	29.4%	57,827	21.40%	39,138	40.10%
1990 to 1999	220,420	22.9%	1,213	17.1%	3,377	29.20%	42,595	29.1%	69,870	25.80%	19,432	19.9%
1980 to 1989	126,121	13.1%	1,459	20.6%	536	4.60%	14,077	9.6%	42,958	15.90%	4,583	4.7%
1970 to 1979	93,860	9.7%	2,009	28.4%	223	1.90%	6,099	4.2%	28,293	10.40%	4,989	5.1%
1960 to 1969	40,612	4.2%	434	6.1%	90	0.80%	1,550	1.1%	17,789	6.60%	3,705	3.8%
1960 or earlier	29,932	3.2%	1,058	15.0%	122	1.00%	3,981	2.7%	14,452	5.30%	3,974	4.1%

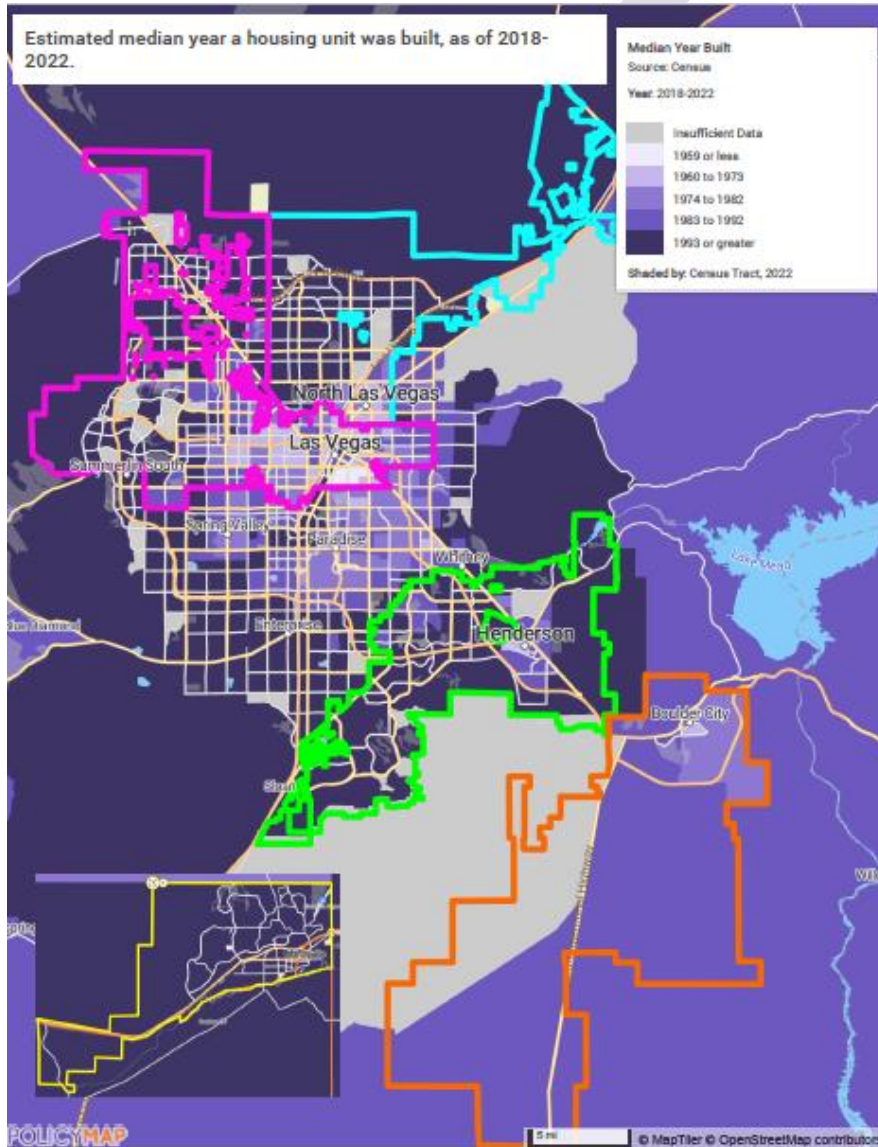
Source: 2023 ACS (DP04)

### Median Year Built

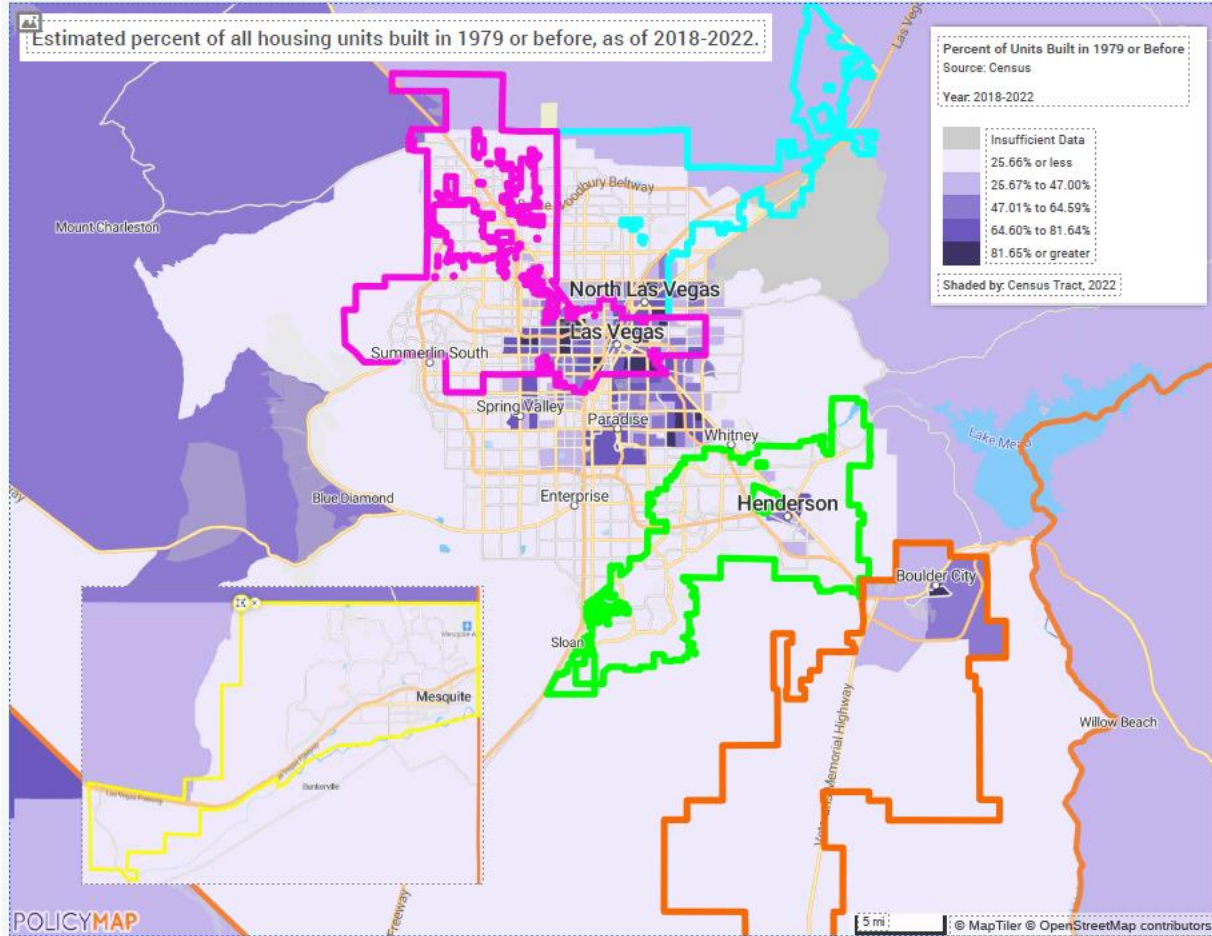


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Map 4.3: Median Year Built



**Map 4.4: Housing Units Built Prior to 1980**



### **Housing Occupancy**

Since 2017, the only household size to increase was the 3-person household unit, and only by 0.2%. All of the other household sizes saw a decrease in the percentage of total units, but grew in total number. 2-person households have remained the most common household size since 2000 and was 33.1% of households by 2023. The 2-person household saw the largest percent decrease between 2017 and 2023 with -1.5%, followed closely by the decline of 4-person households at -1.3%.

<b>Table: Occupancy in Clark County from 2000 to 2023</b>							
	2000	Percent of Total	2017	Percent of Total	2023	Percent of Total	Percent Change (2017-2023)
Total Occupied Units	512,253	100%	749,858	100%	880,604	100%	
1-person household	125,473	24.5%	211,490	28.2%	253,701	28.8%	-0.4%
2-person household	175,189	34.2%	244,194	32.6%	291,093	33.1%	-1.5%
3-person household	82,923	16.2%	115,728	15.4%	137,466	15.6%	0.2%
4-or-more-person household	128,668	25.1%	178,446	23.8%	198,344	22.5%	-1.3%

Source: 2000 Census (H013, SF1), 2013-2017 ACS (S2501)

The vacancy rate in Clark County saw a decrease of -8% between 2017 and 2023, following the approximately 6% increase seen between 2020 and 2017. This is a decrease in vacancy by nearly 45,000 housing units. All cities in Clark County had less than a 5% vacancy rate as of the 3rd quarter in 2024.

<b>Table: Vacancy Rate in Clark County from 2000 to 2023</b>							
	2000	Percent	2017	Percent	2023	Percent	Percent Change (2017-2023)
Total Units	559,799	100%	877,617	100%	880,604	100%	
Vacant Units	47,546	8.5%	127,759	14.6%	82,867	8.6%	-8.0%

Source: 2000 Census (H006, SF3), 2013-2017 ACS (DP04)

Race and ethnicity are often linked to a household’s economic situation. Residents who have lower incomes or less economic stability are less likely to be homeowners. Close to 70% of Black residents are renters while only 35.1% of White residents and 31.1% of Asian residents are renters. Hispanic residents are more likely to be homeowners than Black residents but not as likely as White or Asian residents – about half of all Hispanic residents are homeowners.

<b>Table: Housing Tenure By Race/Ethnicity in Clark County, 2023</b>					
<b>Race</b>	<b>Total</b>	<b>Owner-Occupied</b>	<b>Percent Owner</b>	<b>Renter-Occupied</b>	<b>Percent Renter</b>
White	455,130	295,306	64.9%	159,824	35.1%
Black	111,862	38,166	34.0%	73,696	65.9%
Asian	90,467	62,279	68.9%	28,188	31.1%
<b>Ethnicity</b>					
Hispanic	214,687	109,968	51.2%	104,719	48.8%
Total	880,604	509,177	57.8%	371,427	42.0%

Source: 2013-2017 ACS (B25003, B25003A, B25003B, B25003D, B25003I)

## Housing Costs

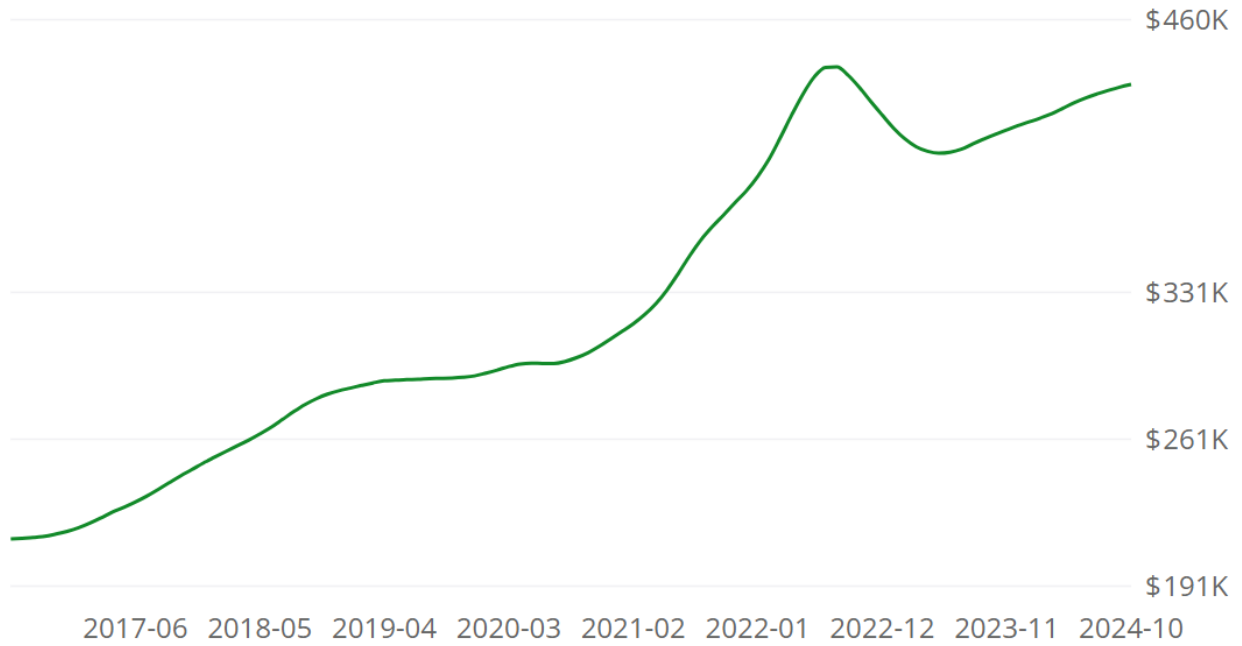
### Owner Occupied Housing Costs

Since 2010, the average home value has increased throughout the region. Between 2010 and 2017, the home value decreased in every location by at least -16.6%. However, between 2017 and 2022, the median home prices rose significantly in all locations. Clark County's median home value rose by 73.7% between 2017 and 2023. North Las Vegas had the largest increase in median home value at 89.3%. According to Zillow, in August of 2022 the average home value reached a high of \$438,481 before decreasing slightly in early 2023. Since then, the median home value has been increasing and reached \$430,112 in October of 2024. The Zillow graph below illustrates median home value trends in Clark County over recent years.

<b>Municipality</b>	<b>2010</b>	<b>2017</b>	<b>2022</b>	<b>Percent Change</b>		
				<b>2010-2017</b>	<b>2010-2022</b>	<b>2017-2022</b>
Clark County	\$257,300	\$212,300	\$368,800	-17.5%	43.3%	73.7%
Las Vegas	\$251,300	\$209,700	\$365,300	-16.6%	45.4%	74.2%
North Las Vegas	\$236,400	\$179,700	\$340,200	-24.0%	43.9%	89.3%
Henderson	\$311,600	\$266,200	\$427,900	-14.6%	37.3%	60.7%
Boulder City	\$314,000	\$241,600	\$410,100	-23.1%	30.6%	69.7%
Mesquite	\$232,100	\$204,400	\$333,400	-11.9%	43.6%	63.1%

Source: 2000 Census (DP4, SF4), 2010, 2017, 2022 ACS 5-year estimates (DP04)

Clark County

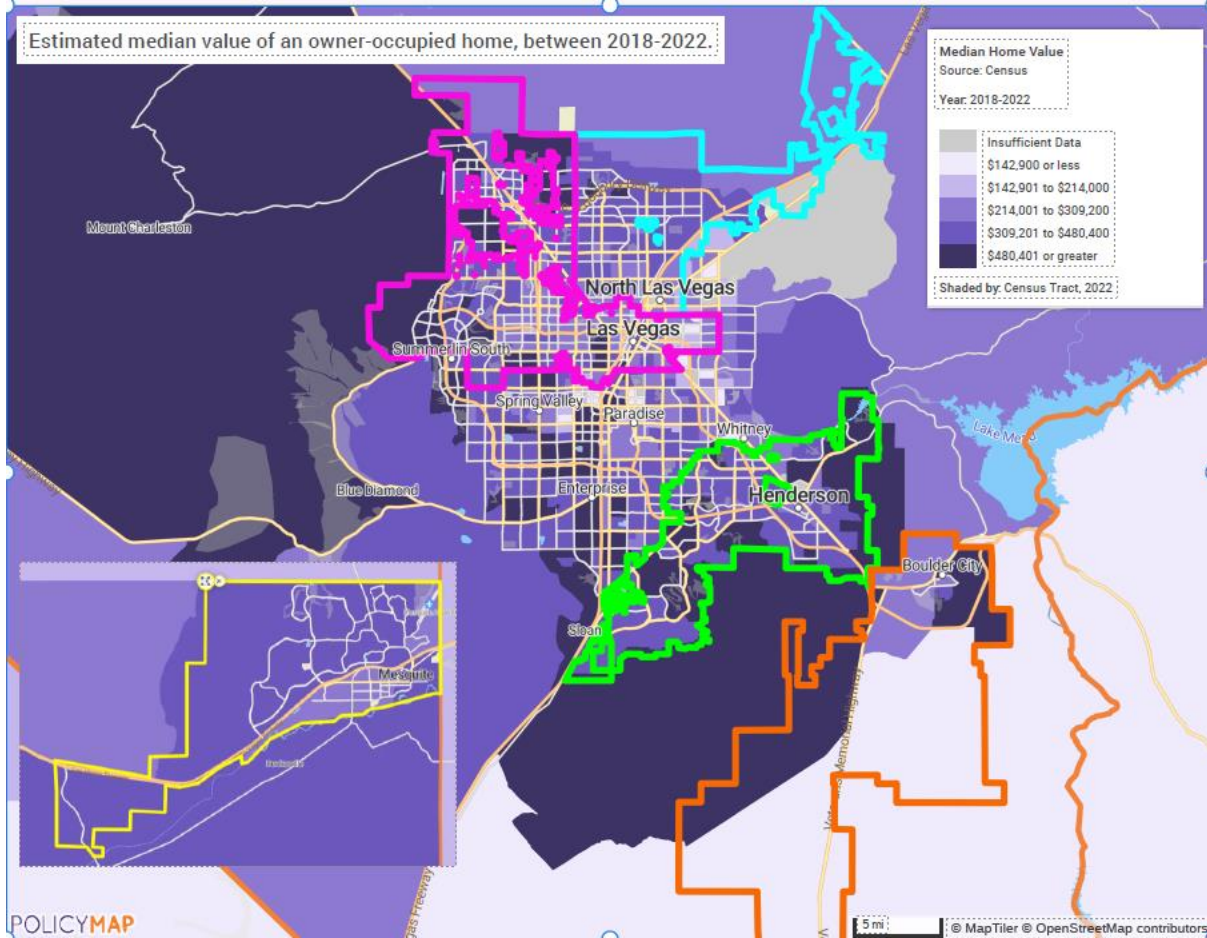


The maps below show both the median home values throughout the County and the percent change of home values. Although all areas have seen an increase in home values over the last 5 years, Las Vegas and North Las Vegas have seen higher rates of growth. The cities of Henderson and Boulder City saw lower increases in home values but they still have higher home values than areas closer to downtown.

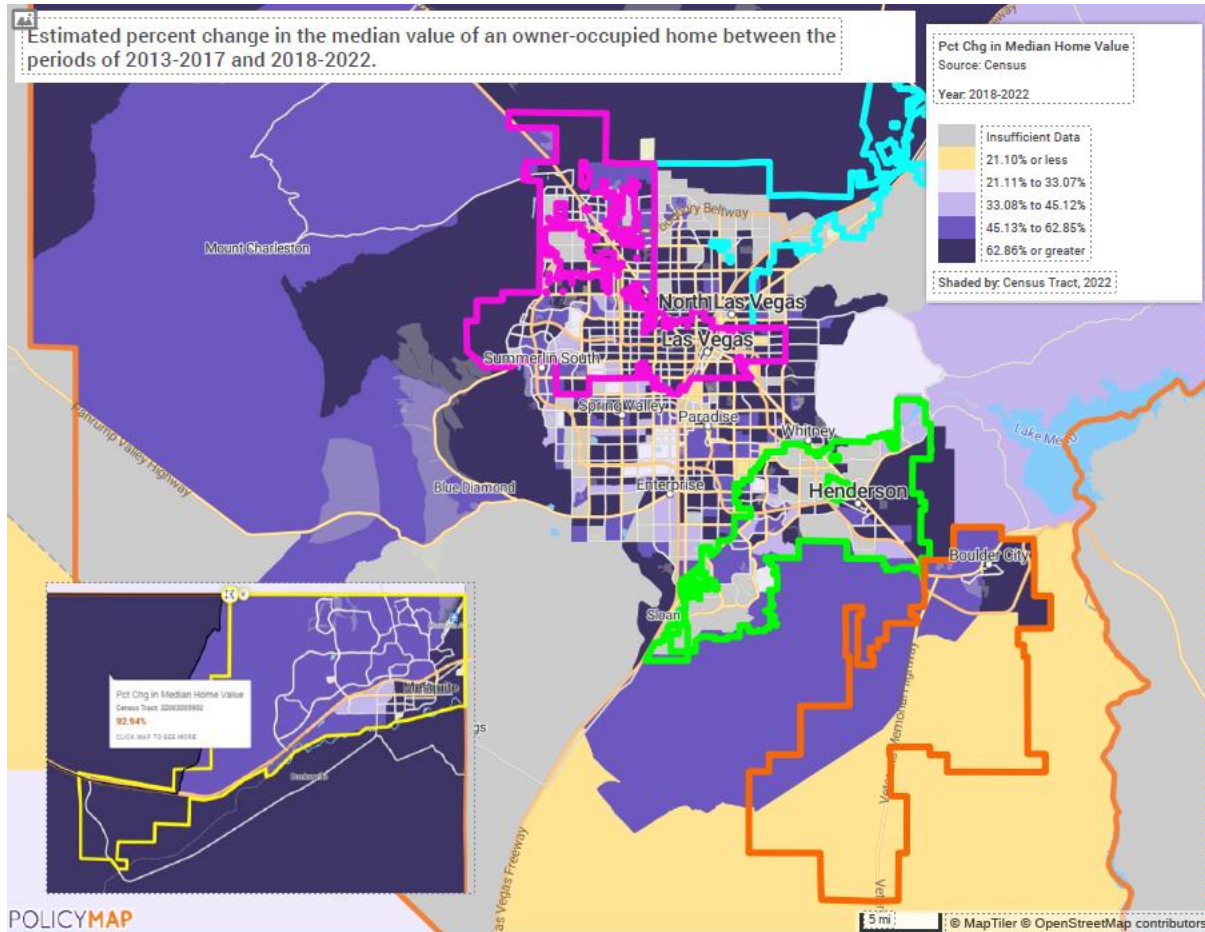
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Map 4.5: Median Value of Owner-Occupied Housing Units



**Map 4.6: Percent Change in the median value of homeowner housing units**



### Renter Occupied Housing Costs

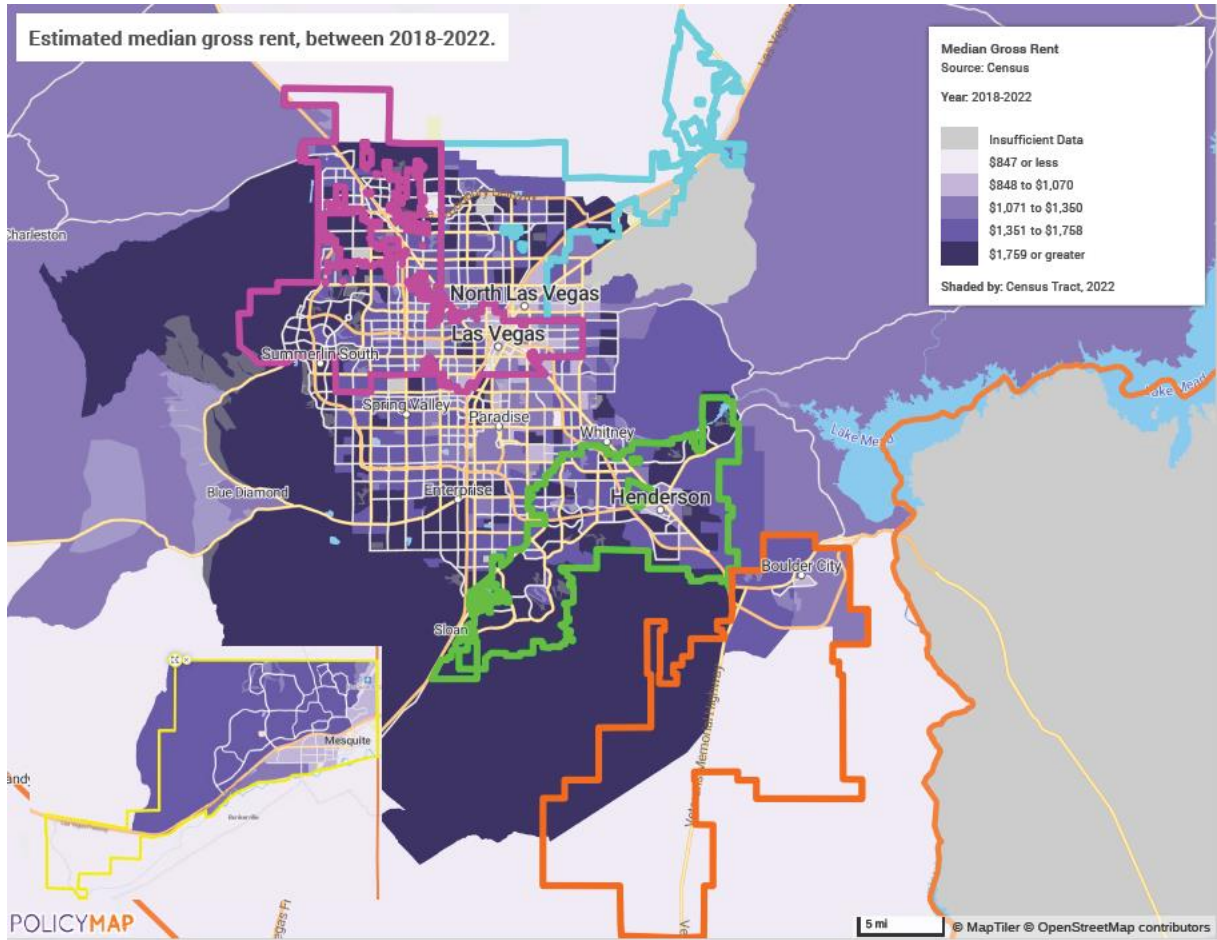
The median rental prices have also continued to increase throughout Clark County since 2017. Between 2010 and 2017, Boulder City was the only selected municipality that had a significant increase at 23.9%. Mesquite saw a -7.9% decline in rental prices during this same period, and all other municipalities remained relatively stable. Between 2010 and 2022, all selected municipalities saw increases in median rent prices. Between 2017 and 2022, North Las Vegas saw the highest increase in rents at 23.3%, following a period of no change between 2010 and 2017. Mesquite had the lowest increase in rental prices between 2017 and 2022, but still saw a 13.5% increase. The highest median rent in the area in 2022 was North Las Vegas, followed closely by Henderson. The lowest median rent in the area in 2022 was Mesquite. All municipalities have seen an overall increase in median rent prices between 2010 and 2022 due to the increasing cost of housing, especially in recent years. Boulder City’s median rent saw the highest increase during this time at 45.2%.

Table: Median Contract Rent						
Municipality	2010	2017	2022	Percent Change		
				2010-2017	2010-2022	2017-2022
Clark County	\$1,036	\$1,048	\$1,222	0.1%	17.9%	16.6%
Las Vegas	\$999	\$1,024	\$1,174	2.5%	17.5%	14.7%
North Las Vegas	\$1,140	\$1,140	\$1,463	0.0%	28.3%	28.3%
Henderson	\$1,188	\$1,184	\$1,446	-0.3%	21.7%	22.1%
Boulder City	\$795	\$985	\$1,154	23.9%	45.2%	17.2%
Mesquite	\$886	\$816	\$926	-7.9%	4.5%	13.5%

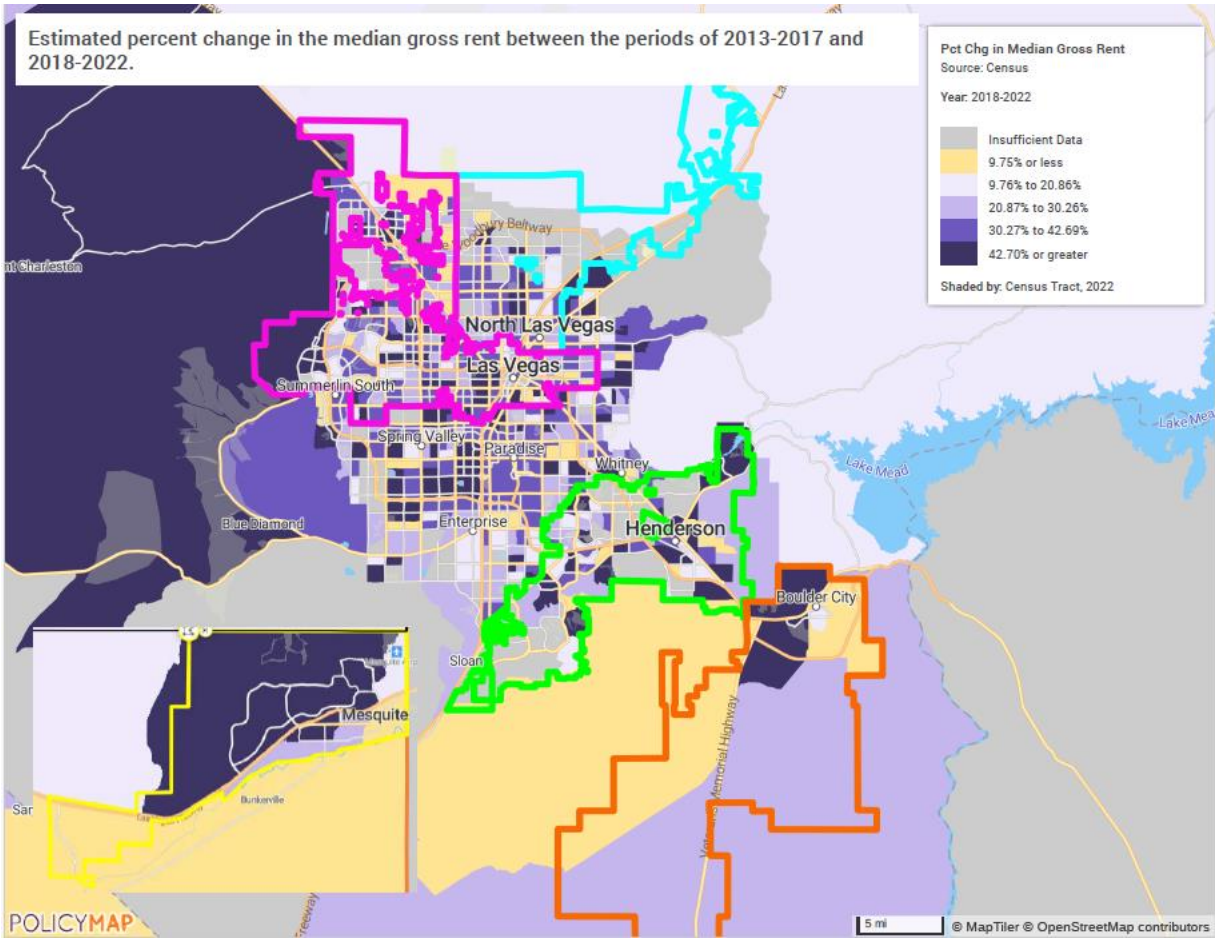
Source: ACS 5-year Estimates (B25058)

Map 4.7 shows the distribution of rental prices throughout Clark County, with the darker shaded areas indicating higher rent prices. Central tracts have generally lower median rents than tracts along the edge of the Las Vegas Valley. Henderson has higher median rent prices spread throughout the city, while North Las Vegas, Las Vegas, and Boulder City see higher rental prices concentrated in certain census tracts. Map 4.8 shows the estimated percent changes in median rental prices throughout the County. Mesquite had some census tracts that saw increases between 70-80%. All municipalities had census tracts with higher increases (shaded by darker purple colors) and areas of lower increase (shaded by lighter purple or yellow), but very few tracts saw decreases.

Map 4.7: Estimated median rental prices



**Map 4.8: Estimated percent change in median rental prices**



## Housing Affordability

### Homeowners

In Clark County in 2023, there were 108,124 homeowner households with a mortgage that were cost burdened by paying over 30% of their income towards housing costs. A little over one-quarter of these residents pay over 35% of their income towards housing costs.

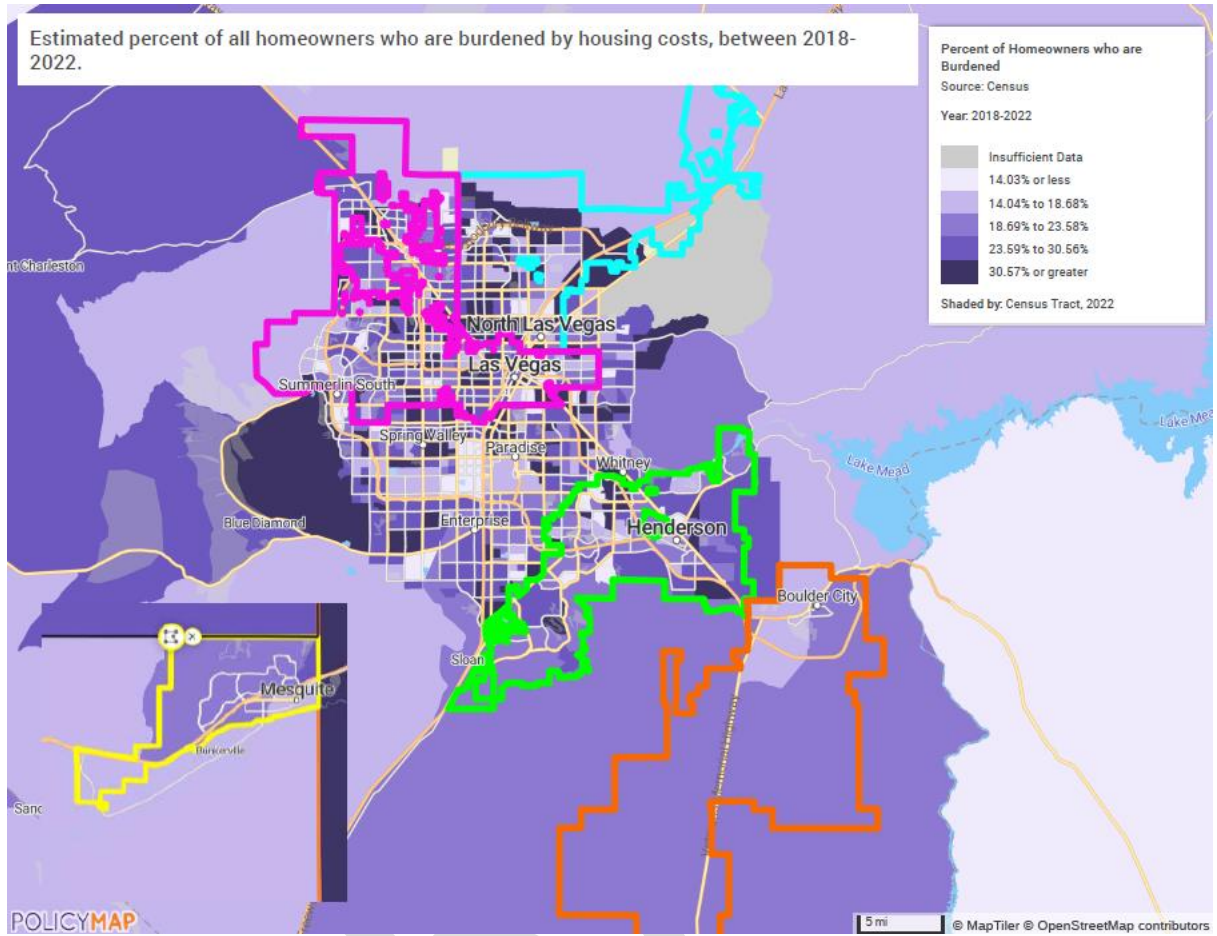
<b>Table: Selected Monthly Housing Costs of Owners with a Mortgage in Clark County</b>		
	Estimate	Percent
Total	335,880	100%
Less than 20.0 percent	145,495	43.3%
20.0 to 24.9 percent	47,647	14.2%
25.0 to 29.9 percent	34,614	10.3%
30.0 to 34.9 percent	22,100	6.6%
35 percent or more	86,024	25.6%
Not computed	2,567	--
Source: 2023 ACS (DP04)		

Homeowners without a mortgage are less likely to be cost burdened than homeowners with a mortgage. However, there are still 20,867 of these homeowners that are cost burdened, or 12.5% of homeowner households without a mortgage.

<b>Table: Selected Monthly Housing Costs of Owners without a Mortgage in Clark County</b>		
	Estimate	Percent
Total	166,921	100%
Less than 10.0 percent	89,825	53.80%
10.0 to 14.9 percent	25,002	15.0%
15.0 to 19.9 percent	15,601	9.3%
20.0 to 24.9 percent	9,453	5.7%
25.0 to 29.9 percent	6,173	3.7%
30.0 to 34.9 percent	4,197	2.5%
35 percent or more	16,670	10.0%
Not computed	3,809	--
Source: 2023 ACS (DP04)		

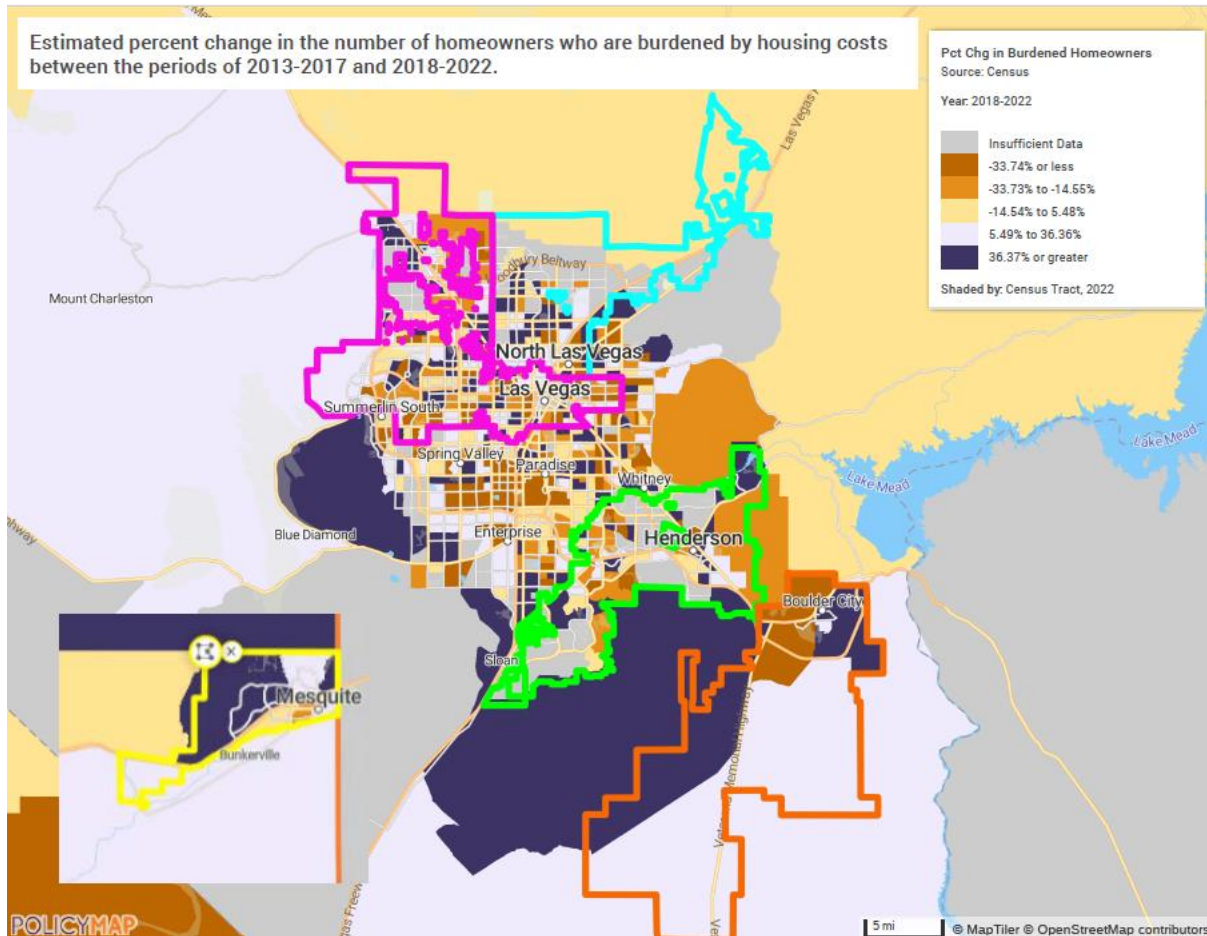
The maps below show the distribution of homeowner households throughout the County, as well as the percent change over the last 5 years. All areas of the Las Vegas Valley experience cost burden. The darker blue shaded areas indicate census tracts with a higher concentration of cost burdened homeowner households. The northern border of North Las Vegas shows that almost 50% of homeowner households are cost burdened. Between 2017 and 2022, the larger dark blue shaded census tract in Mesquite saw just over a 75% increase in cost burdened homeowners and the smaller darker blue shaded tract on the eastern edge saw an estimated 94% increase in cost burdened homeowners.

**Map 4.9: Estimated percent of cost-burdened homeowner households**





**Map 4.10: Estimated percent change of cost-burdened homeowner households**



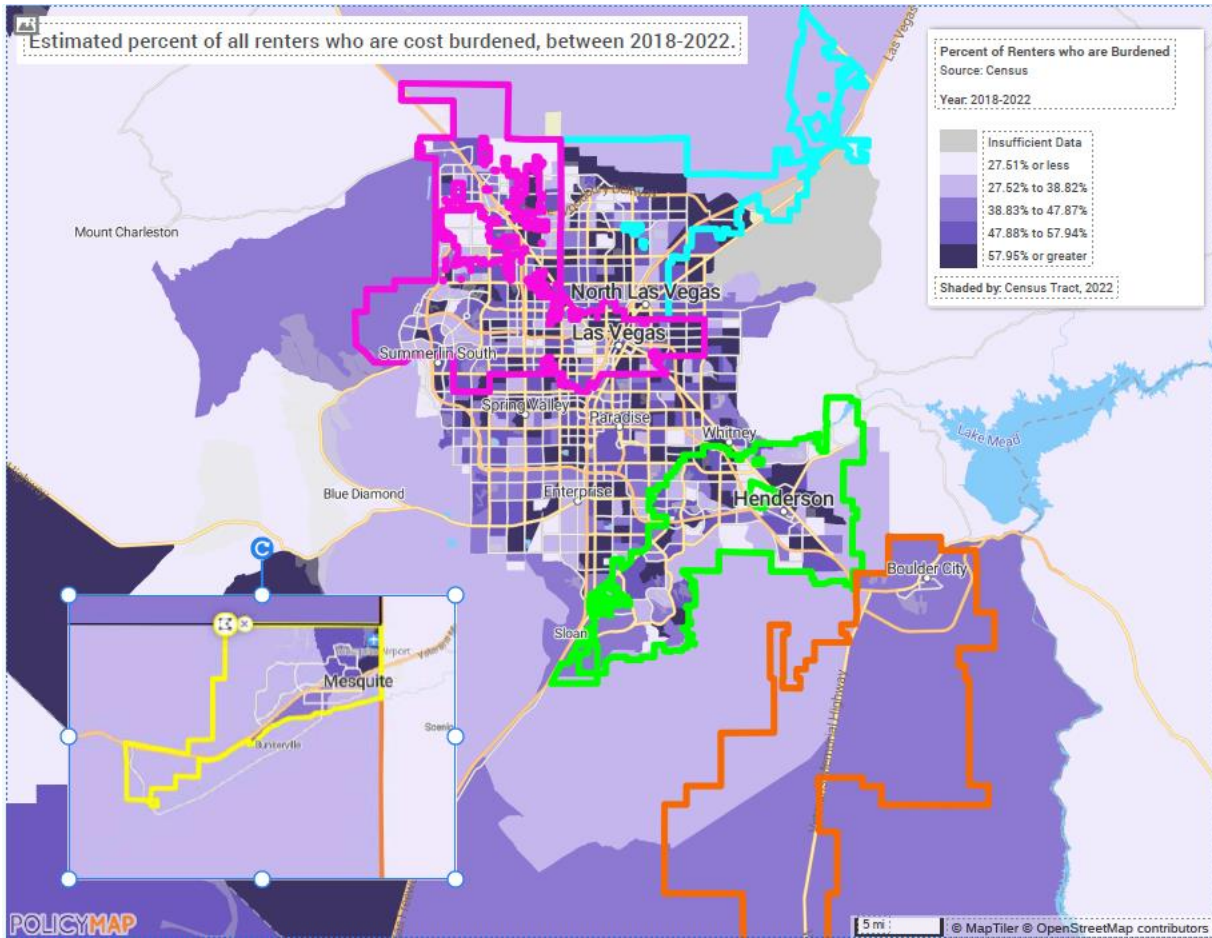
### Renters

Renter households are much more likely than homeowner households to be cost burdened in Clark County. In 2023, nearly 60% of all renter households were cost burdened. Nearly 50% of households were severely cost burdened and paying more than 35% of their income towards housing costs. The maps below show that cost burdened renters are spread throughout the County, with the darker shaded areas indicating a higher concentration. All selected municipalities also had census tracts that had large increases in the percent of cost burdened renter households between 2017 and 2022, indicated by the dark blue shaded areas.

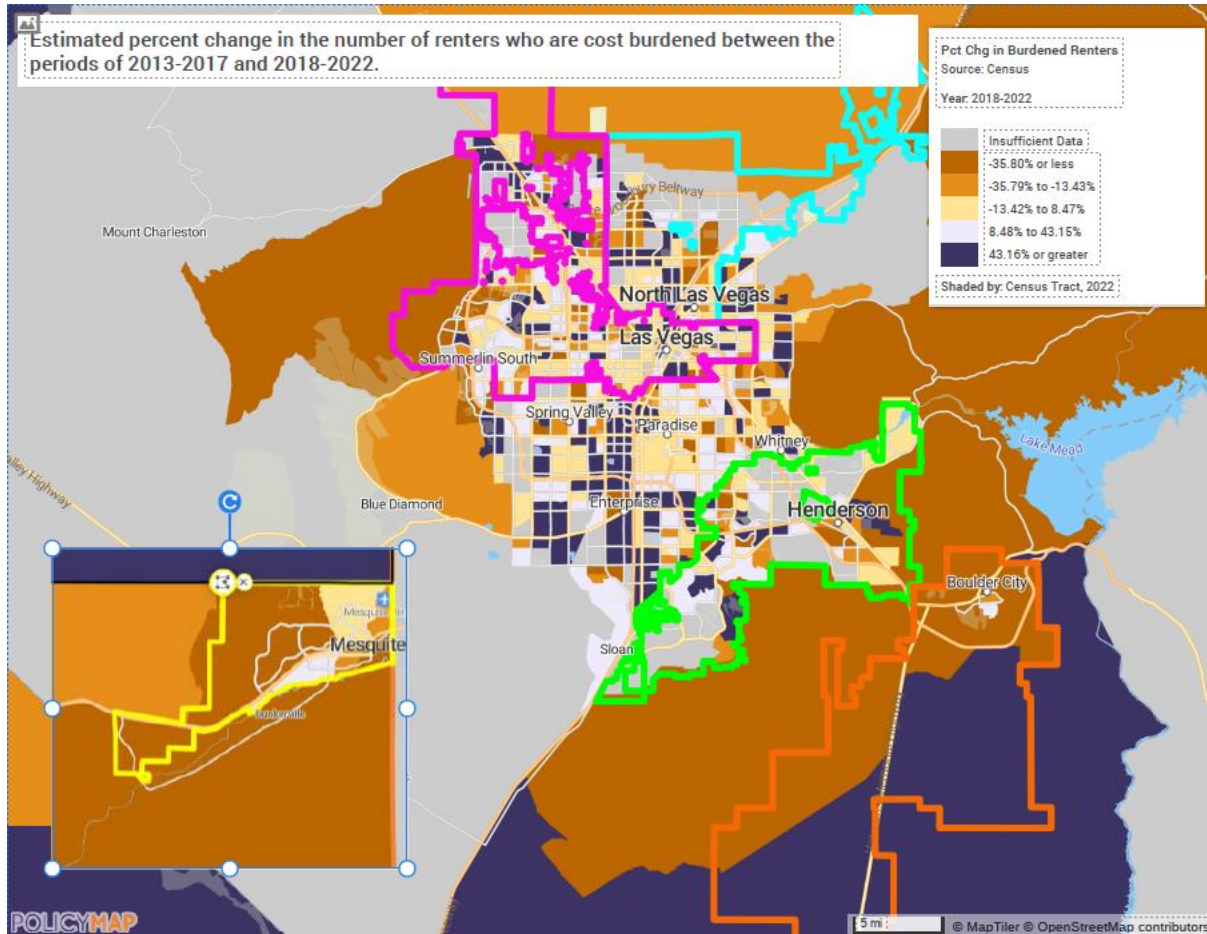
<b>Table: Selected Monthly Housing Costs of Renters in Clark County</b>		
	Estimate	Percent
Total	349,374	100%
Less than 15.0 percent	25,617	7.30%
15.0 to 19.9 percent	35,584	10.2%
20.0 to 24.9 percent	42,096	12.0%
25.0 to 29.9 percent	39,243	11.2%
30.0 to 34.9 percent	33,795	9.7%
35 percent or more	173,039	49.5%
Not computed	22,053	--
Source: 2023 ACS (DP04)		

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Map 4.11: Estimated percent of cost-burdened renter households



**Map 4.12: Estimated percent change of cost-burdened renter households**



### Public Housing Status

The Southern Nevada Regional Housing Authority (SNRHA) is the public housing and voucher agency for Clark County, Las Vegas, Henderson, North Las Vegas, and Boulder City. SNRHA was created in 2010 as a consolidation of several different housing authorities within the Las Vegas Valley. They were created into one with the hopes of better serving the residents and of benefiting from a single management and funding system.

<b>Program Name</b>	<b>Units/Families Served at start of 2019</b>	<b>Expected Turnover</b>
Public Housing	2,651	18.7%
Section 8 Vouchers	7,388	7.4%
Special Purpose Section 8 Vouchers		
- VASH	1,419	18.4%
- NED	1,576	4.6%
- MAIN5	95	4.2%
- FUP	365	9.3%
- RAD PH	323	5.9%
- PBV	118	7.6%
- VASH/PBV	13	0.0%
<b>Total Vouchers</b>	<b>13,948</b>	--

Source: SNRHA, 2019 PHA Plan

<b>Description</b>	<b>Number of Families</b>	<b>Percent of Total</b>
Waiting List Total	9,831	--
Extremely Low-Income <30% AMI	8,747	89.0%
Very Low-Income >30%-50% AMI	904	9.2%
Low Income >50%-80% AMI	180	1.8%
Families and Children	5,248	53.4%
Elderly Families	954	9.7%
Families with a Disability	2,040	20.8%
White	2,163	22.0%
Black	6,202	63.1%
Asian	140	1.4%
Native American Indian/Alaska Native	156	1.6%
Native Hawaiian/Other Pac Islander	135	1.4%
Hispanic or Latino	1,397	14.2%

Source: SNRHA, 2019 PHA Plan

<b>Description</b>	<b>Number of Families</b>	<b>Percent of Total</b>
Waiting List Total	2,038	--
Extremely Low-Income <30% AMI	1,774	87.0%
Very Low-Income >30%-50% AMI	218	10.7%
Low Income >50%-80% AMI	46	2.3%
Families and Children	533	25.9%
Elderly Families	118	6.0%
Families with a Disability	1,234	60.0%
White	558	27.3%
Black	1,400	68.3%
Asian	10	0.5%
Native American Indian/Alaska Native	13	0.6%
Native Hawaiian/Other Pac Islander	23	1.1%
Hispanic or Latino	199	9.7%

Source: SNRHA, 2019 PHA Plan

## CHAPTER 5. FAIR HOUSING IN THE PRIVATE SECTOR

### Home Mortgage Disclosure Act Data Analysis

Statewide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, state, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board; have a home or branch office in one or more metropolitan statistical areas (MSA); or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: 1) the value of the home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; 2) they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or 3) they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

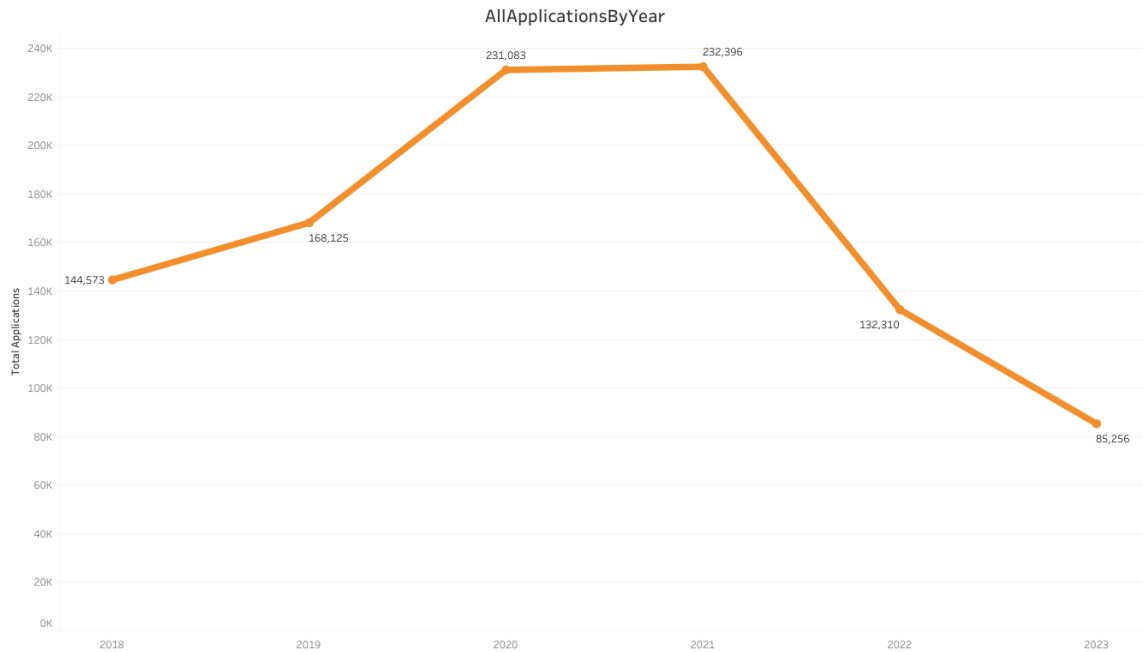
It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the Federal Financial Institutions Examination Council (FFIEC), “with

few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

The following analysis is provided for the Clark County summarizing 2023 HMDA data (and data between 2018 and 2023) where applicable. When specific details are included in the HMDA records, a summary is provided below for loan denials, including information regarding the purpose of the loan application; race of the applicant; and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

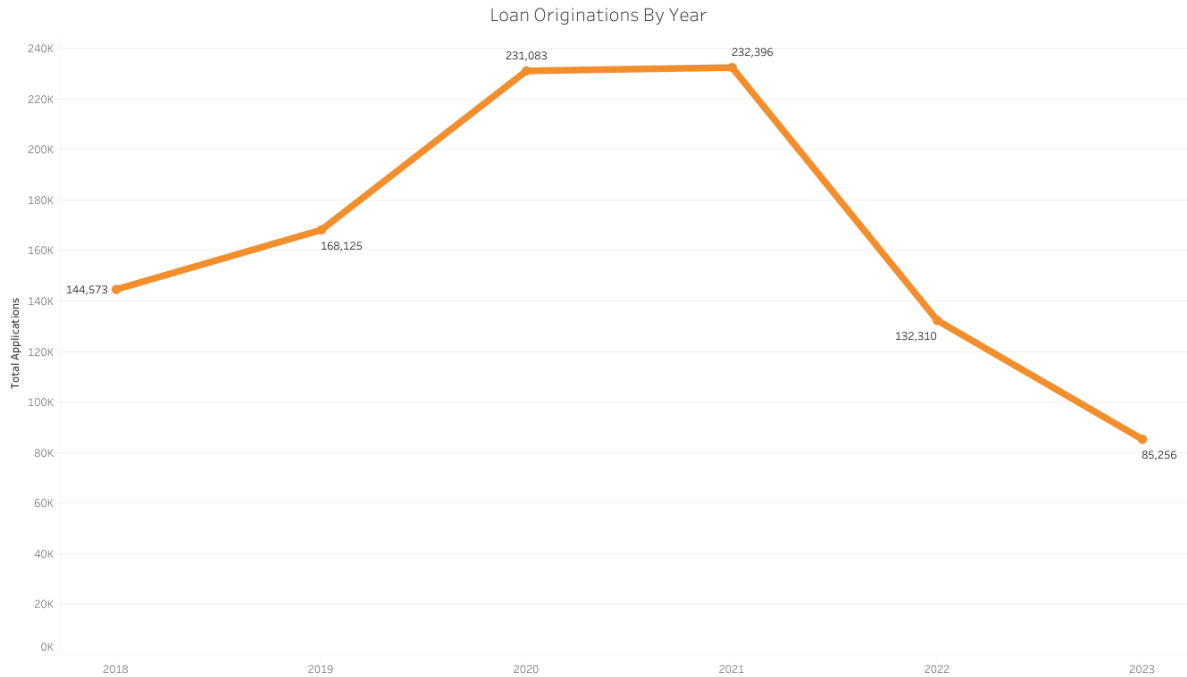
### 2023 County Overview

In 2023, there were approximately 85,256 applications within Clark County for home loans to purchase, refinance or make home improvements for a single-family home (not including manufactured homes).



Source: 2018-2023 HMDA: Total Applications

Of those applications, nearly 41,245 (48%) were approved and originated. This represents a decline from prior years – the peaks were 2020 and 2021. The loan originations have declined to approximately 31% from its peak in 2021 and approximately 62% from 2023. The 2022 to 2023 rate of decline is 38% which is almost similar to the national decline of 34.5%.



**Source: 2018-2023 HMDA: Loan Originations**

Of the remaining 44,071 applications, approximately (34%) of all applications were denied. The top three application denial reasons within the county were debt-to-income ratio (37%), Credit History (23%) and Collateral (13%), representing about 74% of the county’s total denials. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the approximately 28,923 applications that were not originated or denied were closed for one reason or another, including: 1) the loan was approved but not accepted by the borrower; 2) the application was closed because of incomplete information or inactivity by the borrower; or 3) in many instances the application may have been withdrawn by the applicant.



## Disposition of Application by Loan Type and Purpose, 2023

### Single Family Homes (excluding manufactured homes)

	Loan Type	Home Purchase	Refinance	Home Improvement
<b>Total Applications</b>				
	Conventional	32,089	9,695	7,805
	FHA	12,396	3,563	68
	RHS/FSA	89	1	0
	VA	6,332	2,612	4
<b>Loan Originated</b>				
	Conventional	18,238	4,290	3,092
	FHA	6,372	1,195	23
	RHS/FSA	40		
	VA	3,386	816	1
<b>Application approved but not accepted</b>				
	Conventional	874	320	188
	FHA	219	59	0
	RHS/FSA	12	0	0
	VA	108	55	0
<b>Application Denied</b>				
	Conventional	2,533	2,060	3,328
	FHA	961	789	10
	RHS/FSA	10	0	0
	VA	374	525	2
<b>Application withdrawn by applicant</b>				
	Conventional	4,774	1,728	592
	FHA	1,431	755	20
	RHS/FSA	15	1	0
	VA	931	653	0
<b>File closed for incompleteness</b>				
	Conventional	515	910	455
	FHA	96	435	13
	RHS/FSA	0	0	0
	VA	60	356	1

Source: 2023 HMDA

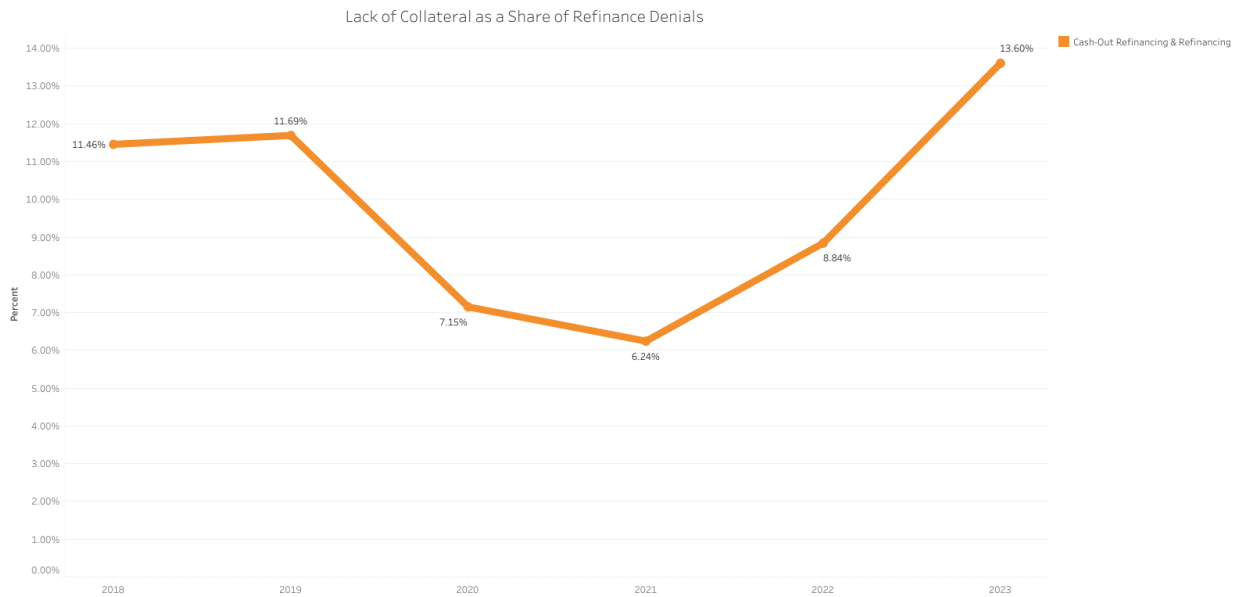
A further examination of the 15,148 denials within Clark County during 2023 indicates that approximately 29% were applicants seeking to do Other Purpose, 22% Home Purchase, and 22% Home Improvement on existing mortgages for owner-occupied, primary residences.

<u>Denial Reason Desc</u>	<u>Cash-Out Refinancing</u>	<u>Home Improvement</u>	<u>Home Purchase</u>	<u>Other Purpose</u>	<u>Refinancing</u>	<u>Total</u>	<u>%</u>
Collateral	341	432	546	599	118	2036	<b>13.44%</b>
Credit Application Incomplete	306	154	368	338	63	1229	<b>8.11%</b>
Credit History	529	1071	518	1274	182	3574	<b>23.59%</b>
Debt-to-Income Ratio	825	1212	1548	1701	336	5622	<b>37.11%</b>
Employment History	31	11	120	16	4	182	<b>1.20%</b>
Insufficient Cash	48	2	238	6	23	317	<b>2.09%</b>
Mortgage Insurance Denied	1	0	1	0	0	2	<b>0.01%</b>
Other	302	345	316	439	128	1530	<b>10.10%</b>
Unverifiable Information	98	112	307	103	36	656	<b>4.33%</b>
Total	2481	3339	3962	4476	890	15148	
%	<b>16.38%</b>	<b>22.04%</b>	<b>26.16%</b>	<b>29.55%</b>	<b>5.88%</b>		

Source: 2023 HMDA

The top three application denial reasons within the county were debt-to-income ratio (37%), Credit History (23%) and Collateral (13%), representing about 74% of the county’s total denials. Majority of Home Purchase and Refinance denials were due to debt-to-income ratio.

Typically, homeowners seeking to refinance their existing home mortgage can use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this could indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option. These homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown below, the lack of collateral as a share of refinance denials has declined since the peak of the housing crisis, suggesting that the number of “under-water” homes in Clark County are increasing again since the lows of 2020 and 2021.



Source: 2018-2023 HMDA

### Home Purchase Lending in Clark County

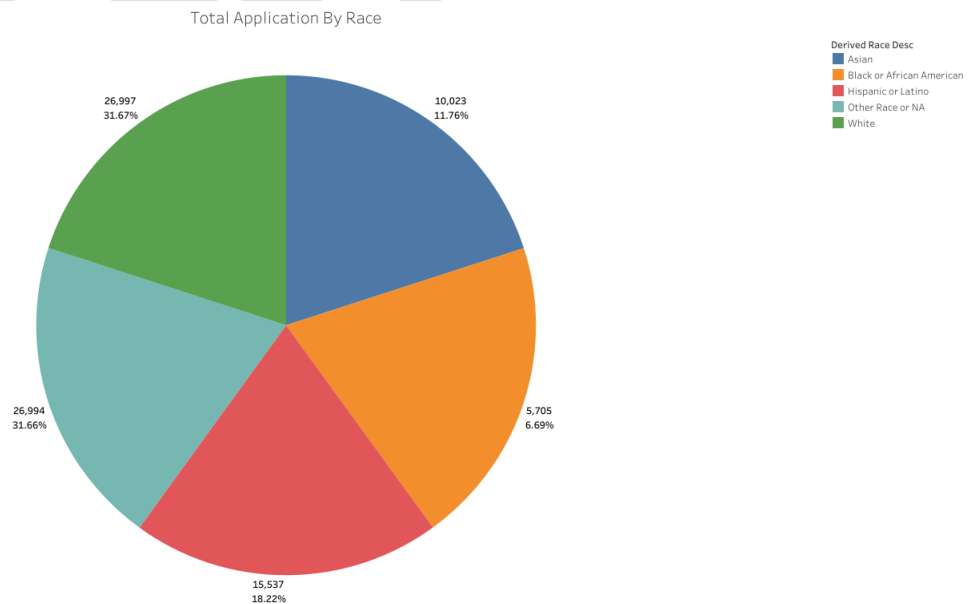
Of the 50,906 home purchase loans for single family homes that originated in 2023, approximately 63% were provided by conventional lenders, lower than the national conventional home purchase share of 73%. The remaining 37% of home purchase loans in Clark County were provided by federally backed sources such as the Federal Housing Administration (FHA), the Farm Service Agency (FSA) and the Department of Veterans Affairs (VA). Non-conventional loans have relatively lower down-payment requirements in comparison to conventional lenders.

### Home Purchases by Type, 2023

	Originations	Share of Total	Approval Rate
Conventional	32,089	63.04%	56.84%
FHA	12,396	24.35%	51.40%
RHS/FSA	89	0.17%	44.94%
VA	6,332	12.44%	53.47%
<b>Total</b>	<b>50,906</b>		

Source: 2023 HMDA

The share of applications and percentage of loan application denials for traditional home purchase loans in Clark County varies by race/ethnic groups. The largest applicant group in 2023 were Other Race (31%) followed by White (31%) and Hispanics (18%). Blacks represented 6.7% of all home purchase applications. Whites were least likely to be denied for conventional single-family home purchases at a rate of 17%, followed by Asians at 21%. Black and Hispanic population applications denial rate was highest at 23%.



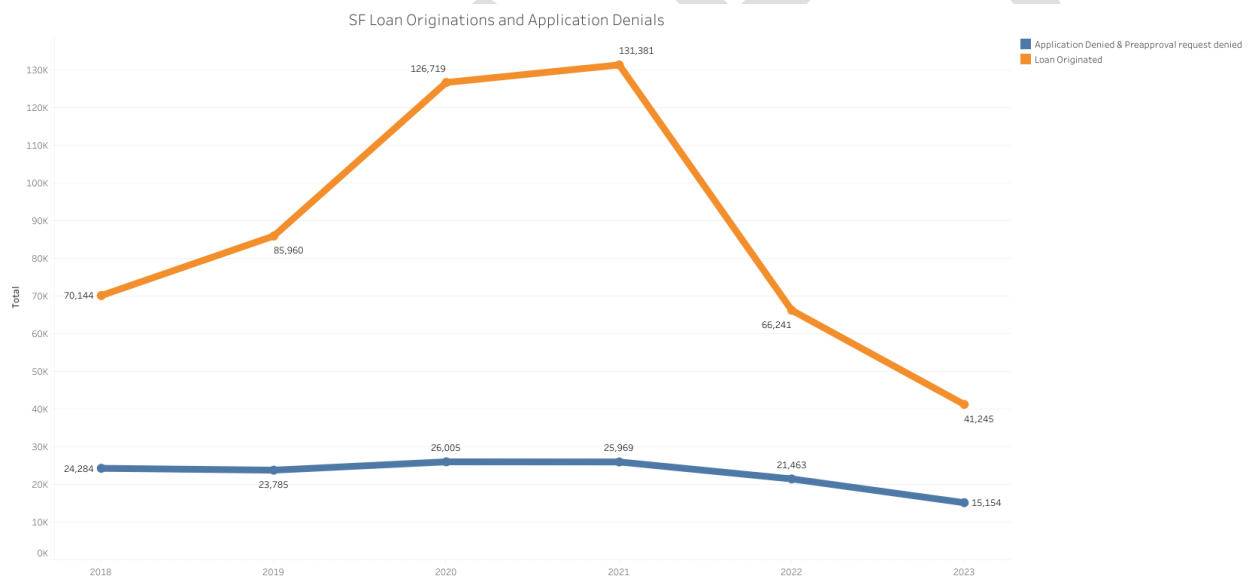
Source: 2023 HMDA

### Clark County's Single-Family Lending Market, 2018-2023

The following section will examine HMDA data for Clark County between 2018-2023.

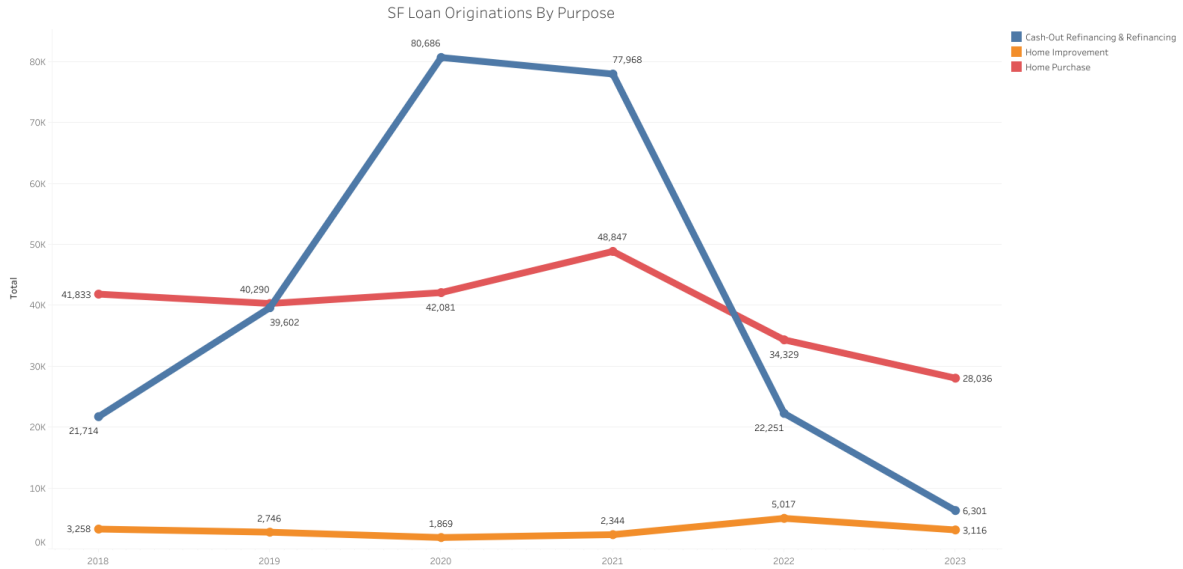
Highlighted below, the number of single-family loan originations in Clark County followed a dynamic, though broadly downward trajectory between 2018-2023. At the onset of the housing boom due to low interest rates, originations increased 47% between 2019 and 2020, followed by a decrease of another 50% between 2021 and 2022. The decrease was due to higher interest rates. The originations further decreased by 37% from 2022 and 2023.

In contrast to originations, the number of application denials within Clark County demonstrated similar behavior. In 2020 and 2021, the denial rate was 20.52% and 19.77% respectively. In 2022 and 2023 as loan originations decreased, the application denials increased with 32.40% and 36.74%.



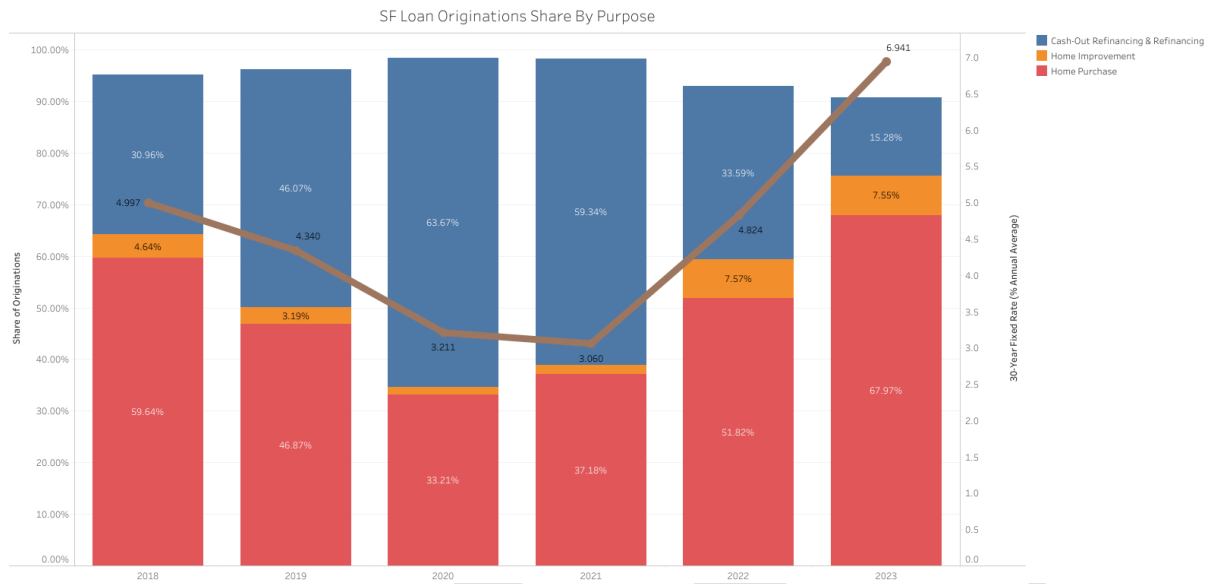
Source: 2018-2023 HMDA

Shown below, much of the year-to-year fluctuations in total originations that occurred between 2018 and 2023 were the result of refinancing originations. Refinancing was the dominant loan for all years examined with the exceptions of 2022 and 2023. Refinance loans grew significantly between 2018 and 2021 as interest rates were broadly low (discussed further below). In 2021 the US 30 YR conventional loans were around 3% and gradually increased to 7% in mid-2023. As of 2023, home purchases and refinances comprised 68% and 15% of the county's total originations respectively. Home purchases have steadily declined in 2022 and 2023.



**Source: 2018-2023 HMDA**

The share of refinance originations in Clark County appears to move generally with the 30-year fixed rate mortgage average (shown below). For example, in 2020 when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest share in absolute and percentage terms of all data years analyzed. Similarly, when interest rates rose between 2021 and 2023, the share of refinance originations fell from 59.34% to 15.28%. The increase in the annual average of the 30-year fixed mortgage rate between 2018 and 2023 is consistent with Clark County’s reduction in the number of refinance loan originations over the same time period.

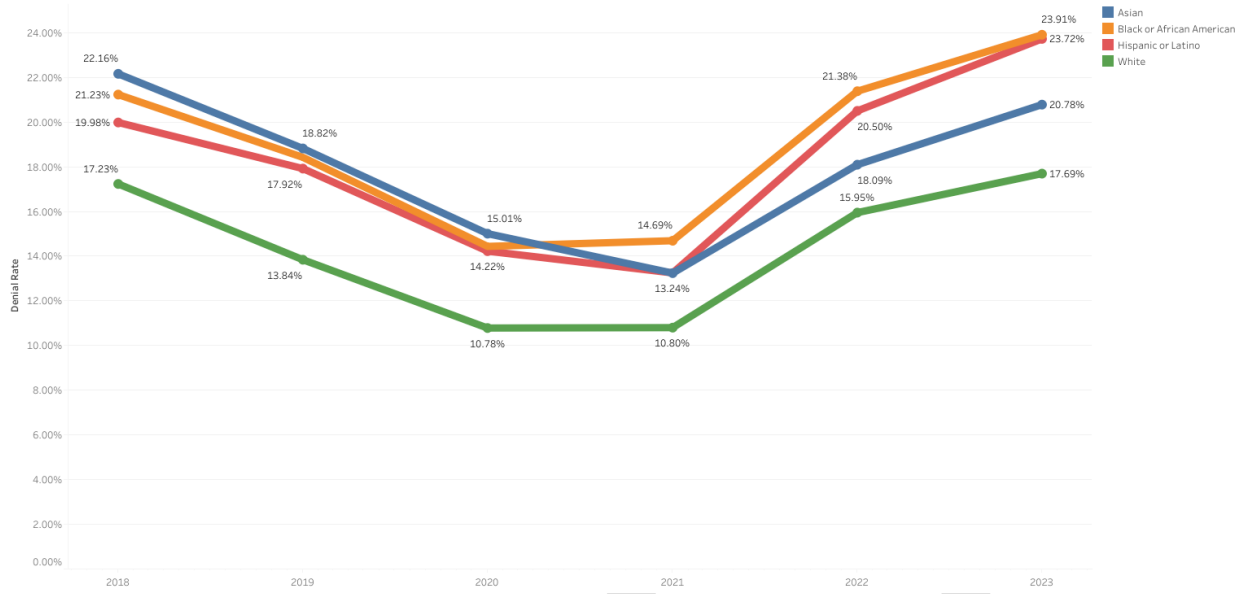


Source: 2018-2023 HMDA

### *Income, Race, and Single-Family Loan Denials in Clark County*

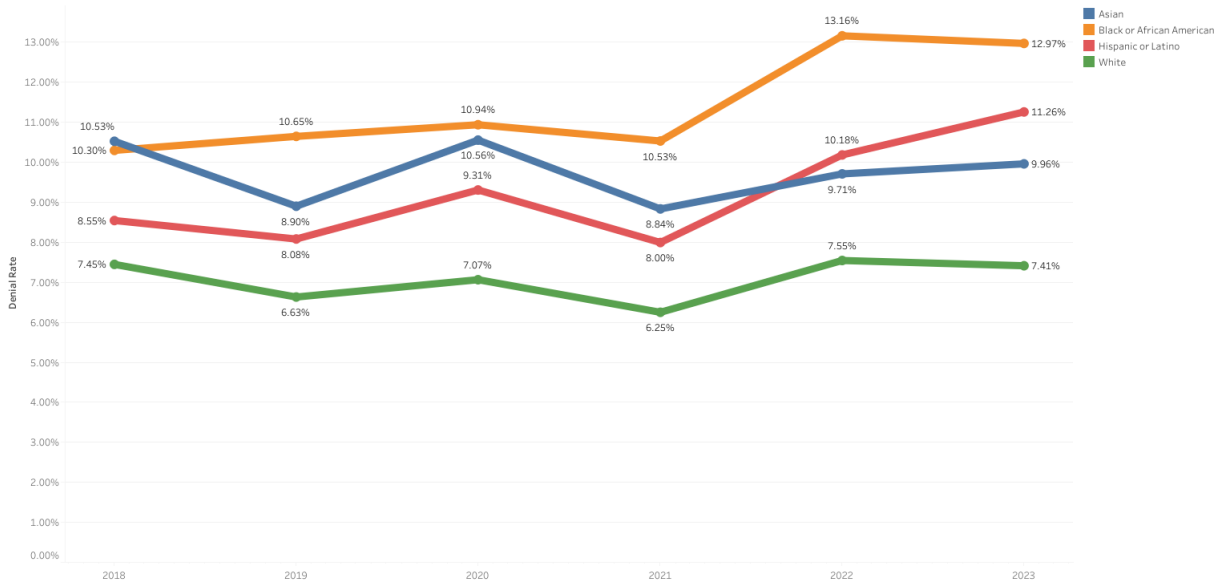
Denial rates for single-family loans in Clark County over time vary by race and ethnicity. The charts below indicate that between 2018 and 2023, White and Asian applicants were less likely to be denied relative to Blacks and Hispanics. Additionally, Black and Hispanic applicants were the most likely to be denied relative to other groups for all years analyzed. In addition to the overall denial rate, this pattern is evident in both home purchase and refinance loans.

Single Family Denial Rate By Race/Ethnicity, Overall



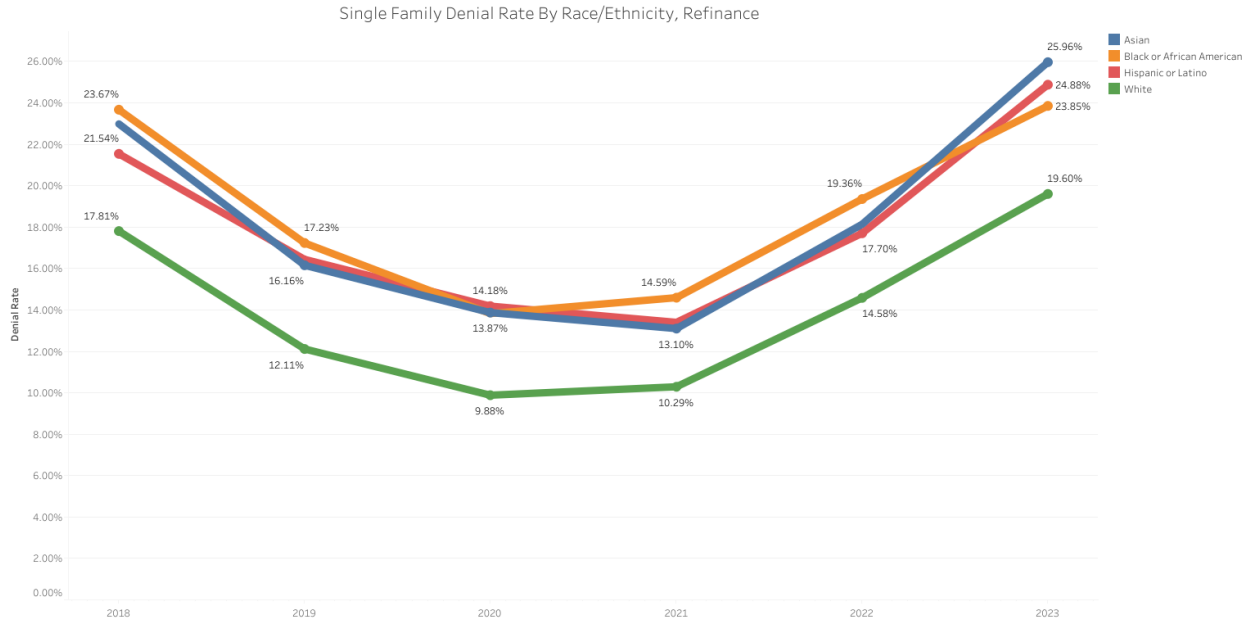
Source: 2018-2023 HMDA

Single Family Denial Rate By Race/Ethnicity, Home Purchase



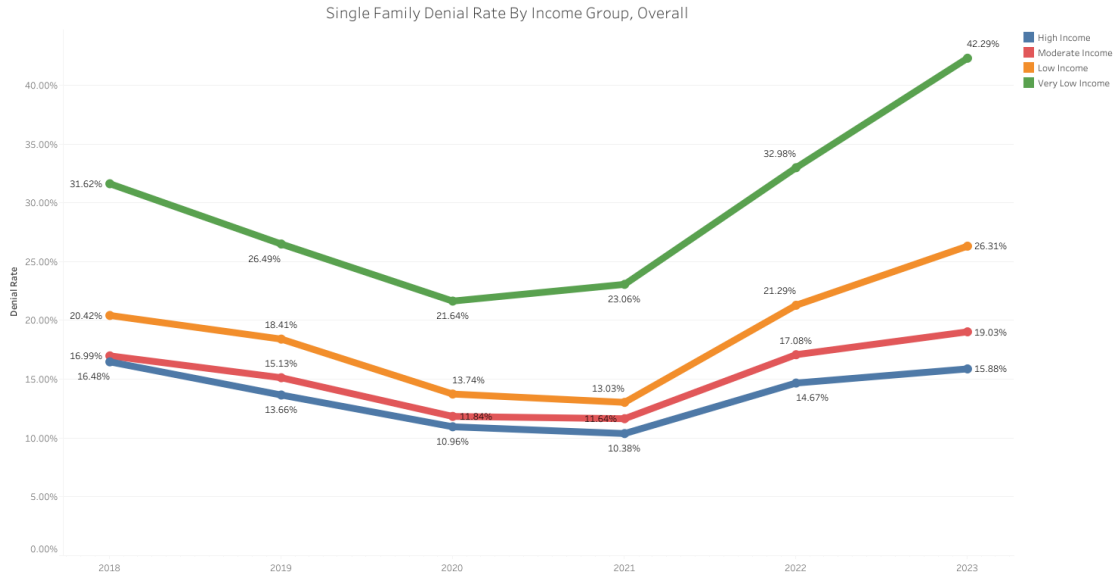
Source: 2018-2023 HMDA





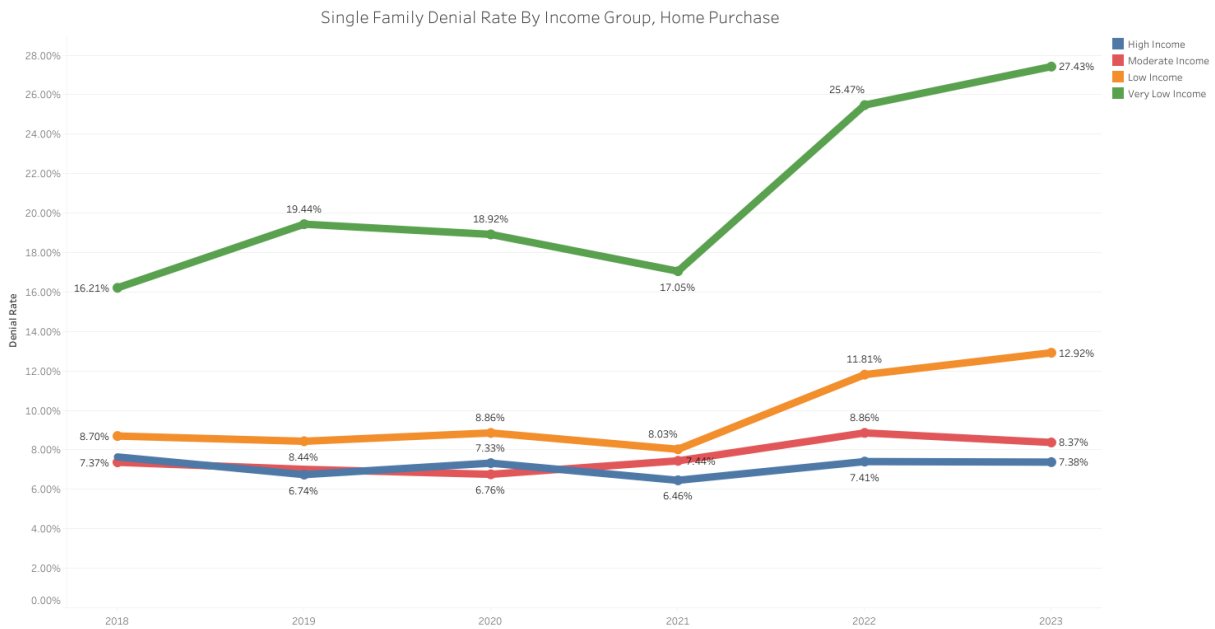
**Source: 2018-2023 HMDA**

A view of single-family denial rates by applicant income group within Clark County (highlighted below) shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. The denials across all income groups have risen since 2022 due to higher interest rates and stagnant wages. However, the percentage of denials by income group has risen with very Low-Income applicants (50% or less of Area Median Income) at 42.29% compared to 15.88% for High Income groups. The variation in the denial rates is considerably higher for lower income groups – while the high-income group denial changed from 14.67% to 15.88% from 2022 to 2023, the very low-income group went from 32.98% to 42.29%.

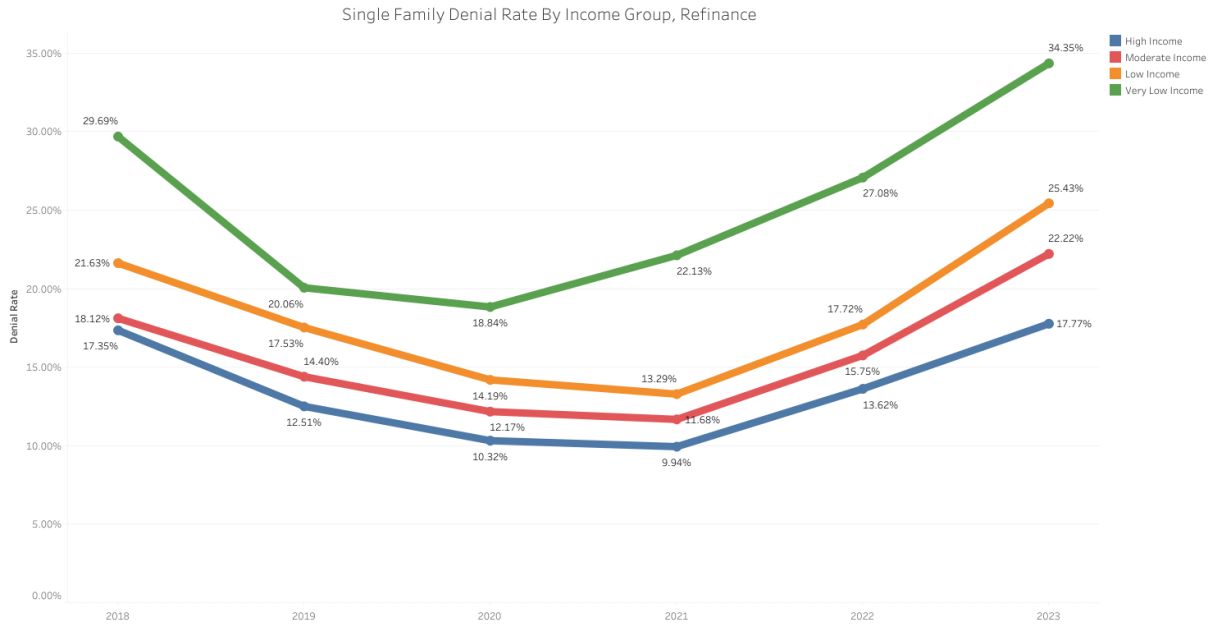


Source: 2018-2023 HMDA

Unlike overall denial rates by income group, home purchase applications denial rates by income group show little variation from year to year within the income group. The denial rates due to refinancing is the major contribution to the income group variations – the very low-income groups are denied at 34.35% in 2023 compared to 17.77% for High income.

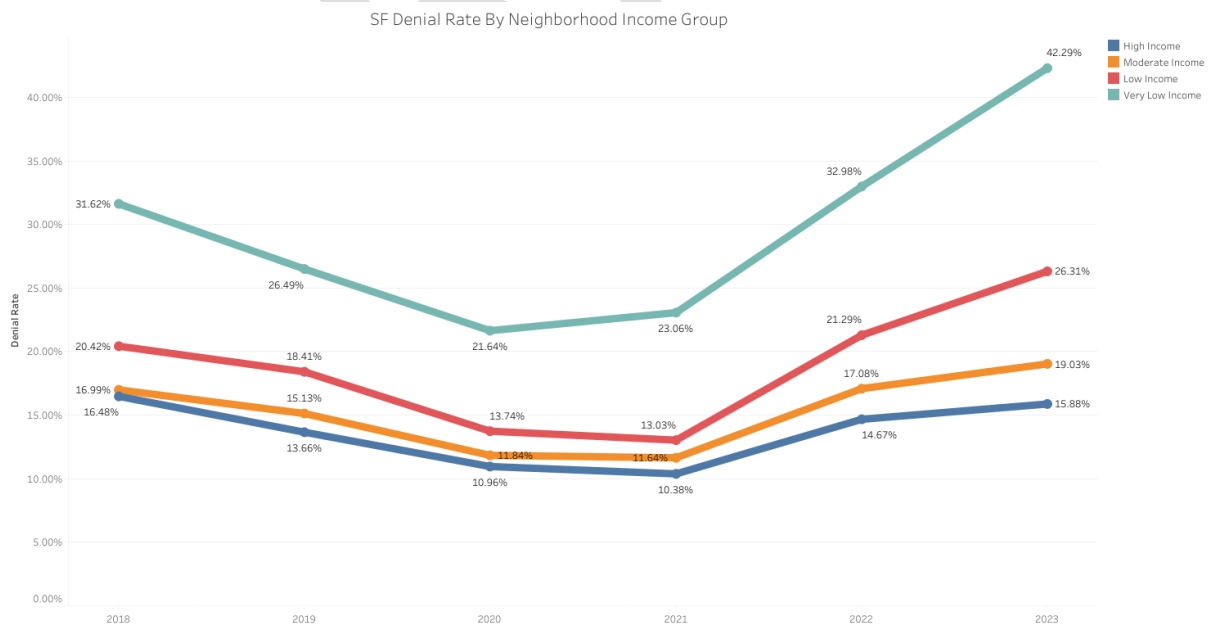


Source: 2018- 2023 HMDA



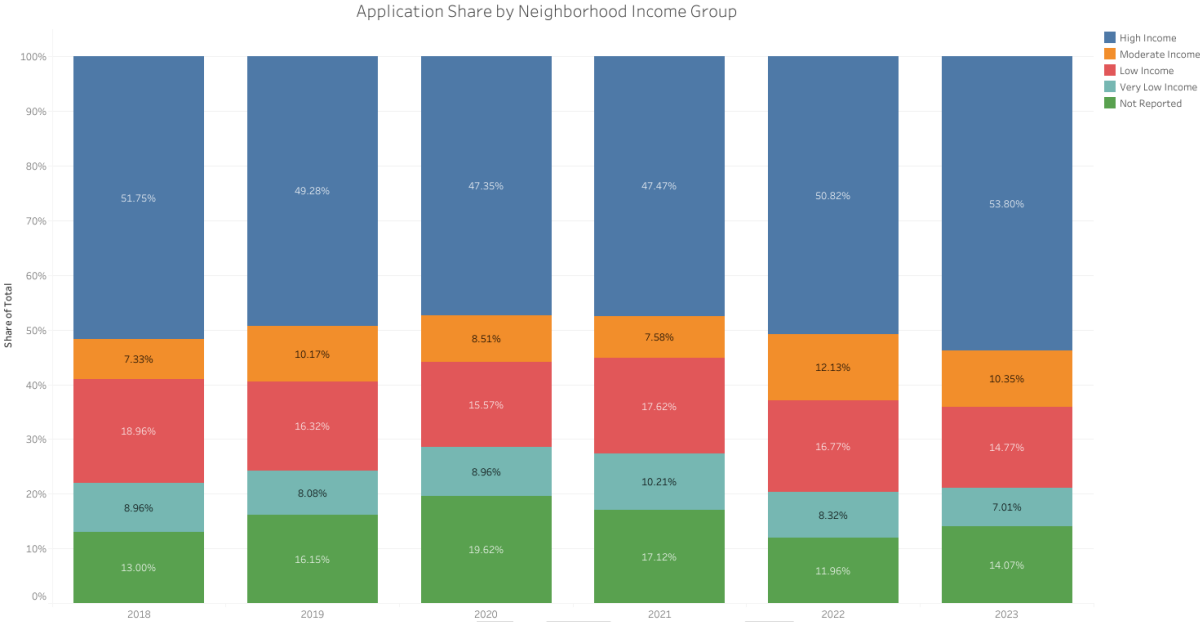
Source: 2018-2023 HMDA

Denial rates by neighborhood income group (defined as median income of property's Census tract) similarly shows higher income neighborhoods are less likely to be denied compared to lower income neighborhoods.



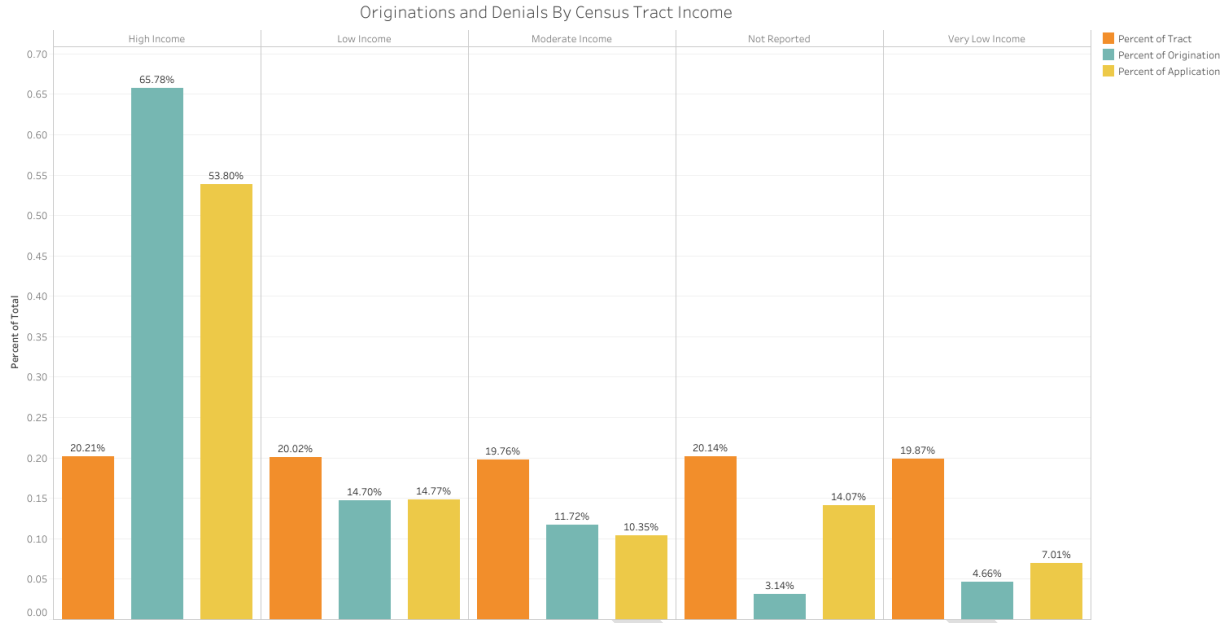
Source: 2018-2023 HMDA

As a percentage of total applications within Clark, the distribution among neighborhoods by income group shows that for every year examined, High-Income neighborhoods represented consistently by 50% of the applications.



Source: 2018-2023 HMDA

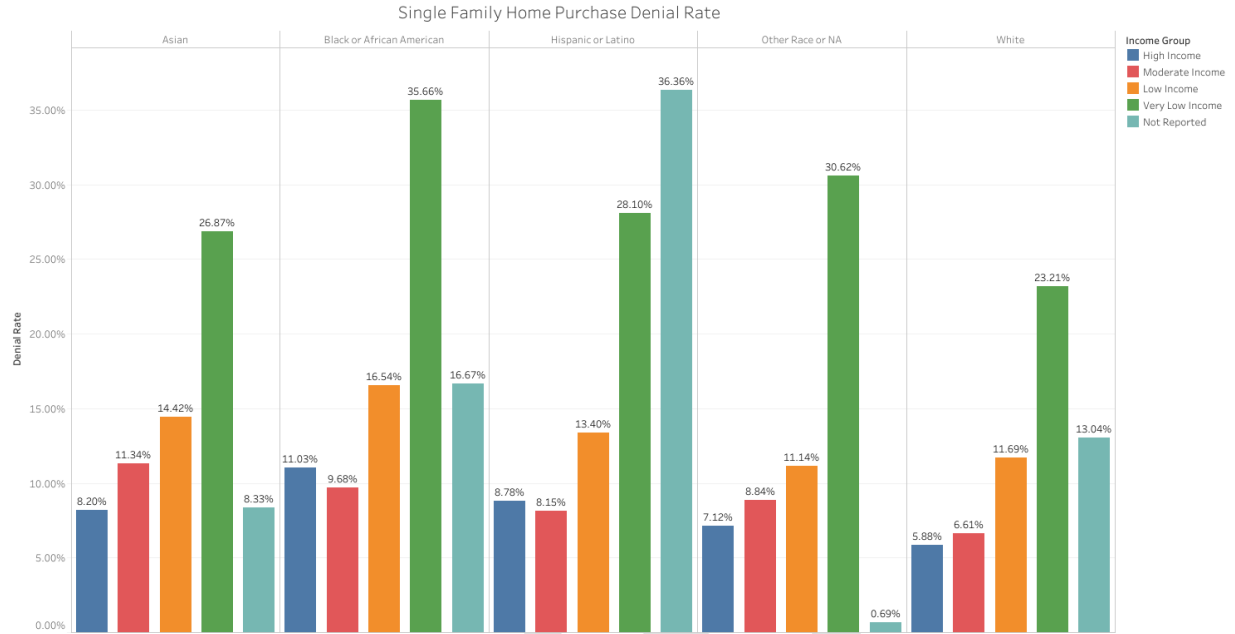
Within Clark, Very Low-Income and Low-Income neighborhoods represent 19.87% of the county’s total neighborhoods, although they are represented by approximately 4.66% of total originations and 7% of applications as of 2023 (shown below). This suggests that Low and Very Low-Income neighborhoods within the county are less likely to participate in the single-family lending market relative to other neighborhoods. By contrast, loan applications and originations within Clark are disproportionately likely to occur for properties in Middle and particularly High-Income neighborhoods.



Source: 2023 HMDA

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Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Clark County (shown below) demonstrates that Very Low Income Black, Hispanic and Other race were more likely to be denied for a single-family home purchase. The White has the lowest denial rates across all income categories.



Source: 2023 HMDA

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### Application Denial Reasons by Income Group

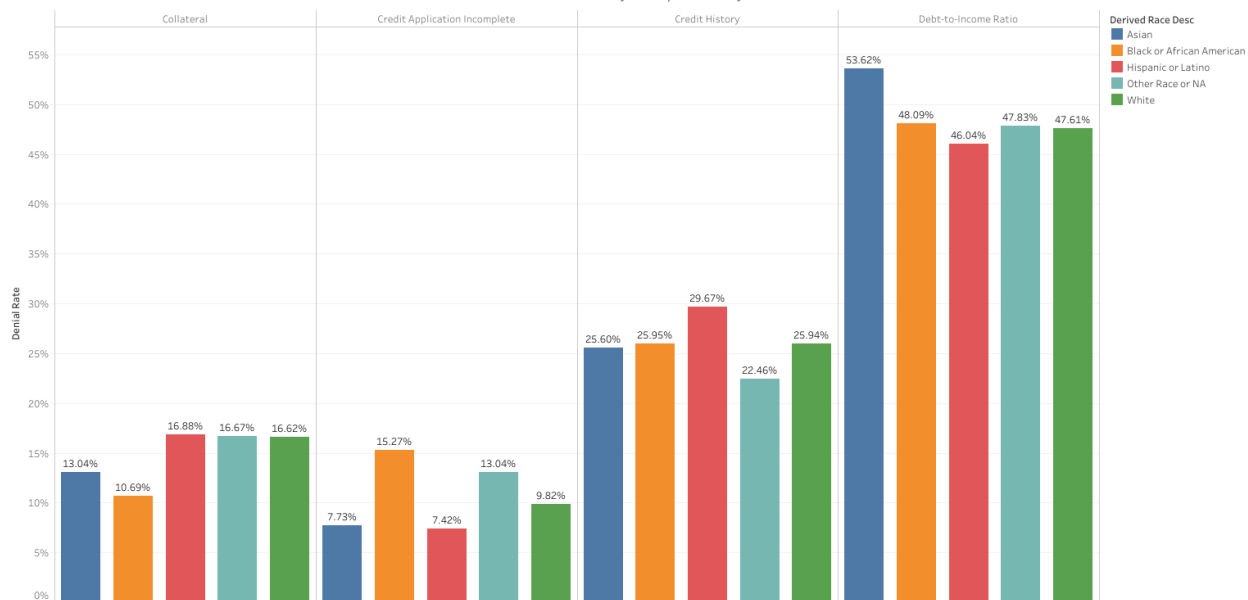
The charts below compare denial reasons among White, Black, Hispanic and Asian applicants in Clark County for 2023 by income group.

As of 2023, the leading denial reason for all applicants across all income groups was Debt-to-Income Ratio and Credit History.



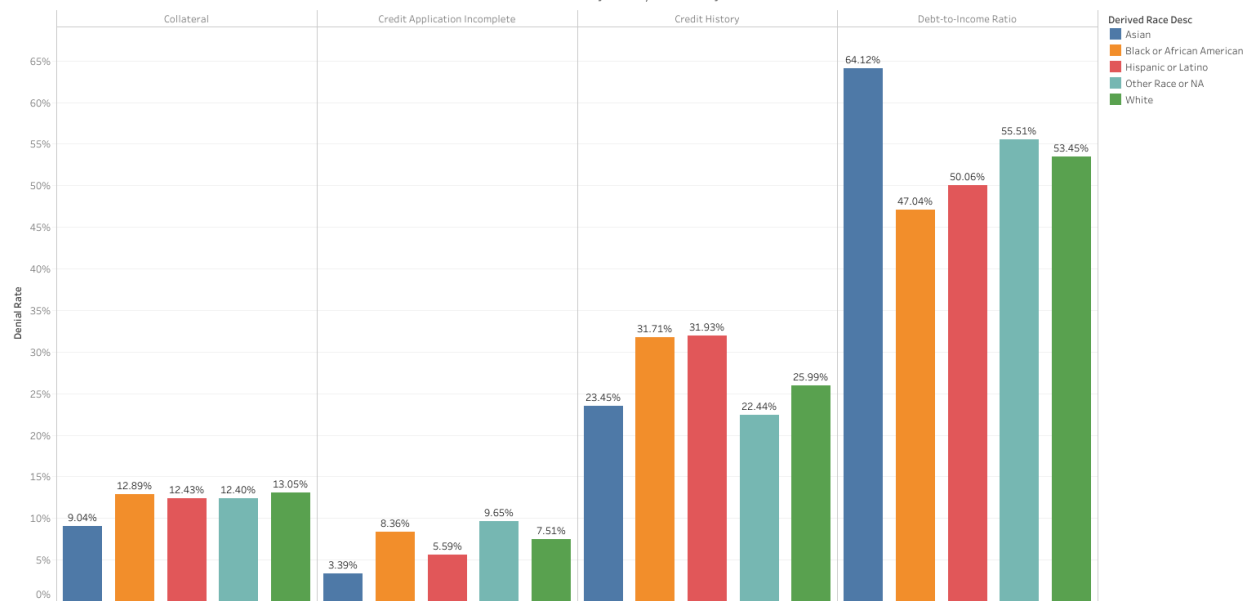
Source: 2023 HMDA

Moderate Income Denial Reason By Race/Ethnicity



Source: 2023 HMDA

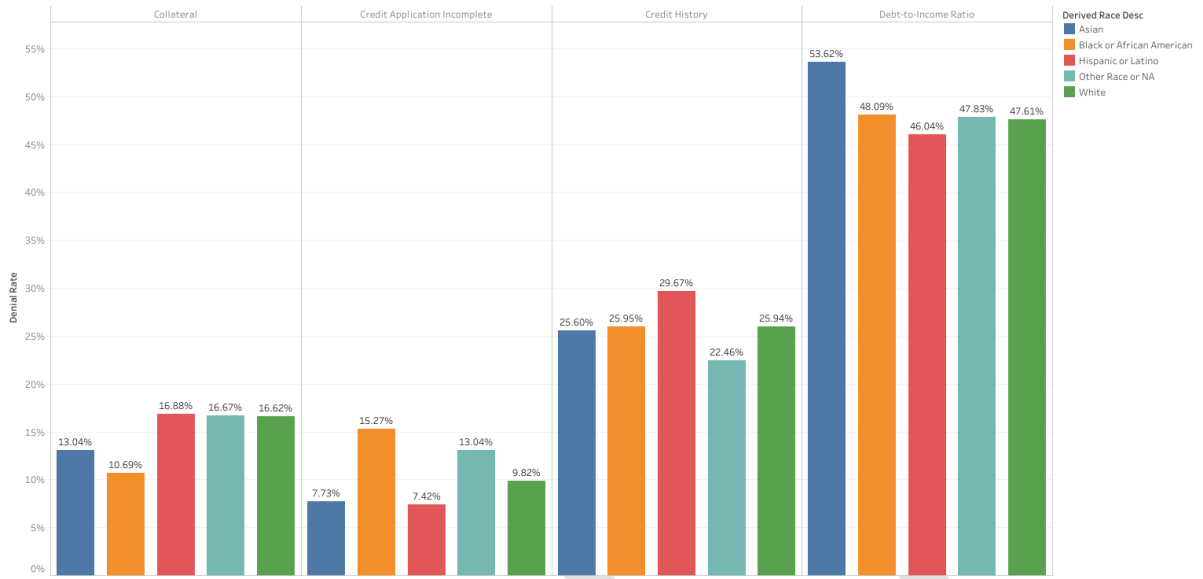
Low Income Denial Reason By Race/Ethnicity



Source: 2023 HMDA



Very Low Income Denial Reason By Race/Ethnicity

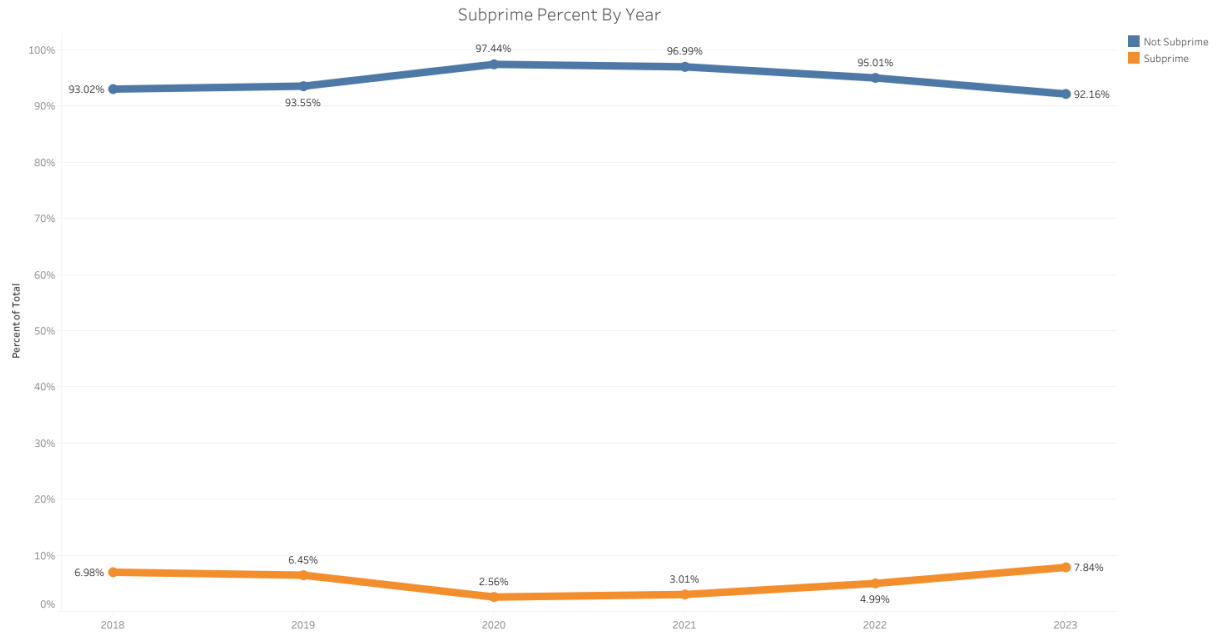


Source: 2023 HMDA

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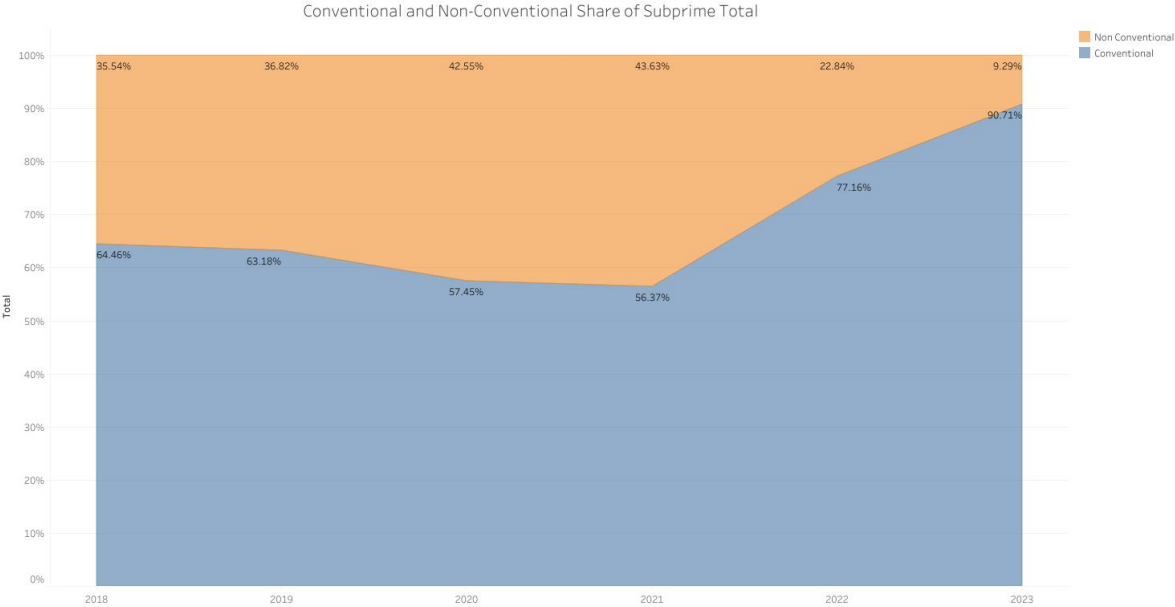
### The Subprime Market

Illustrated below, the subprime mortgage market (Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5%) in Clark County has fluctuated from year to year. The total number of subprime mortgages increased in 2023. The increase is substantial from 5% in 2022 to 7.84% in 2023.



Source: 2018-2023 HMDA

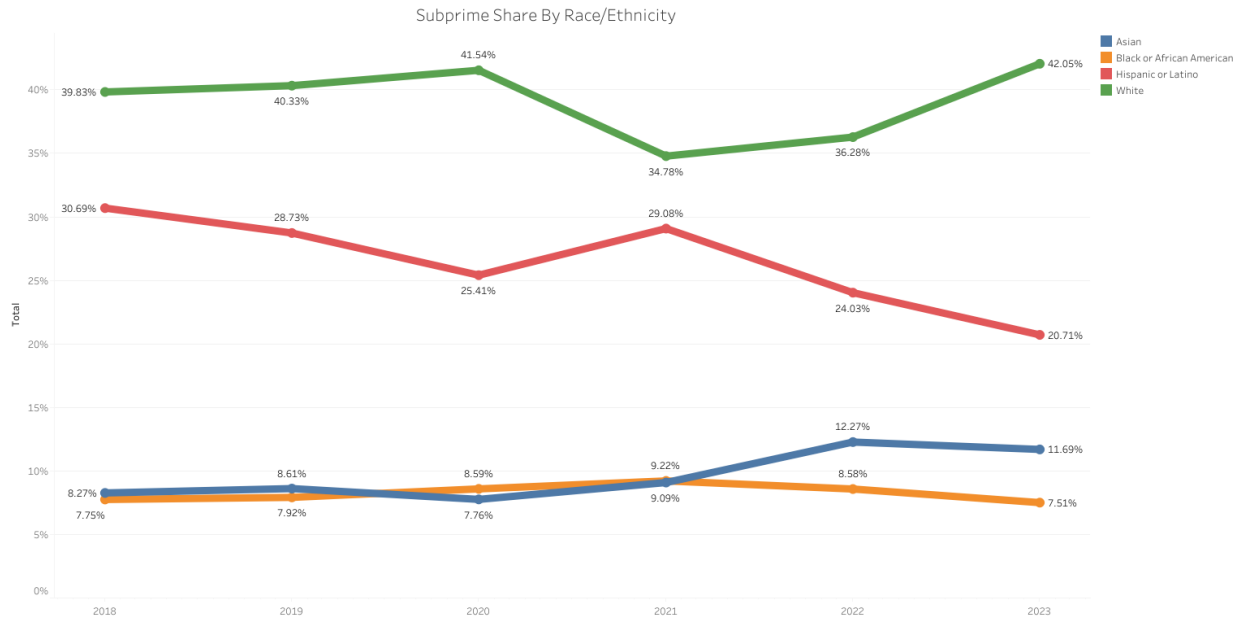
The subprime loans from 2018 to 2023 have steadily increased in Conventional loan applications.



Source: 2018-2023 HMDA

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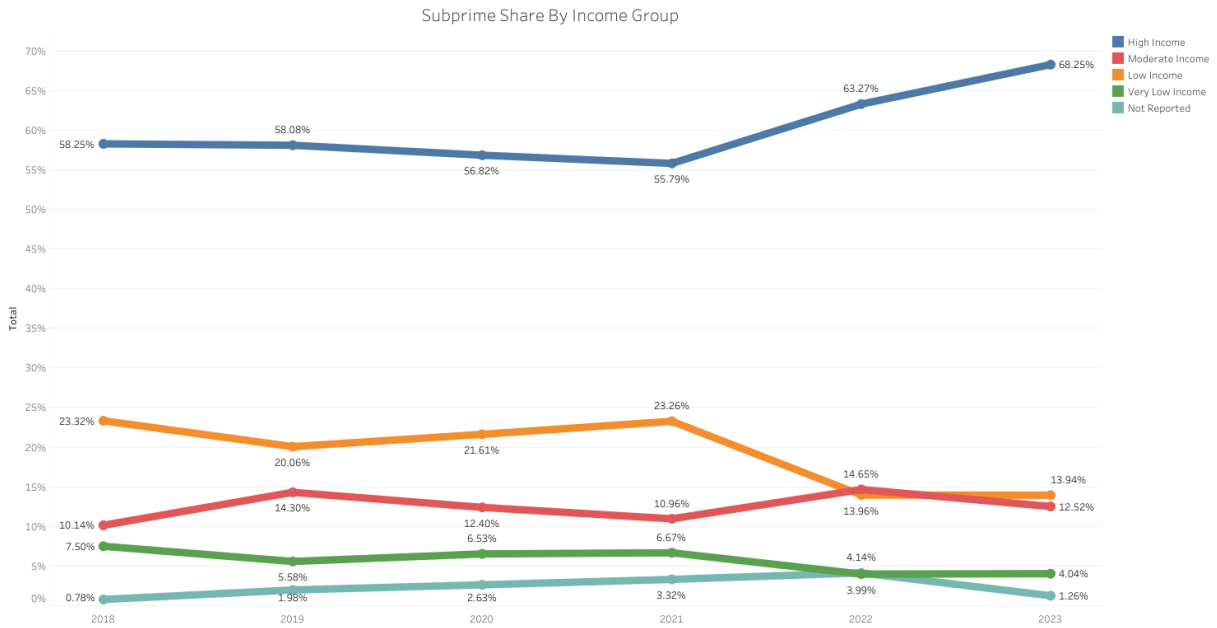
Subprime originations by race/ethnicity show that White and Hispanic loan recipients had the highest share compared to other groups for nearly everyone examined.



Source: 2018- 2023 HMDA

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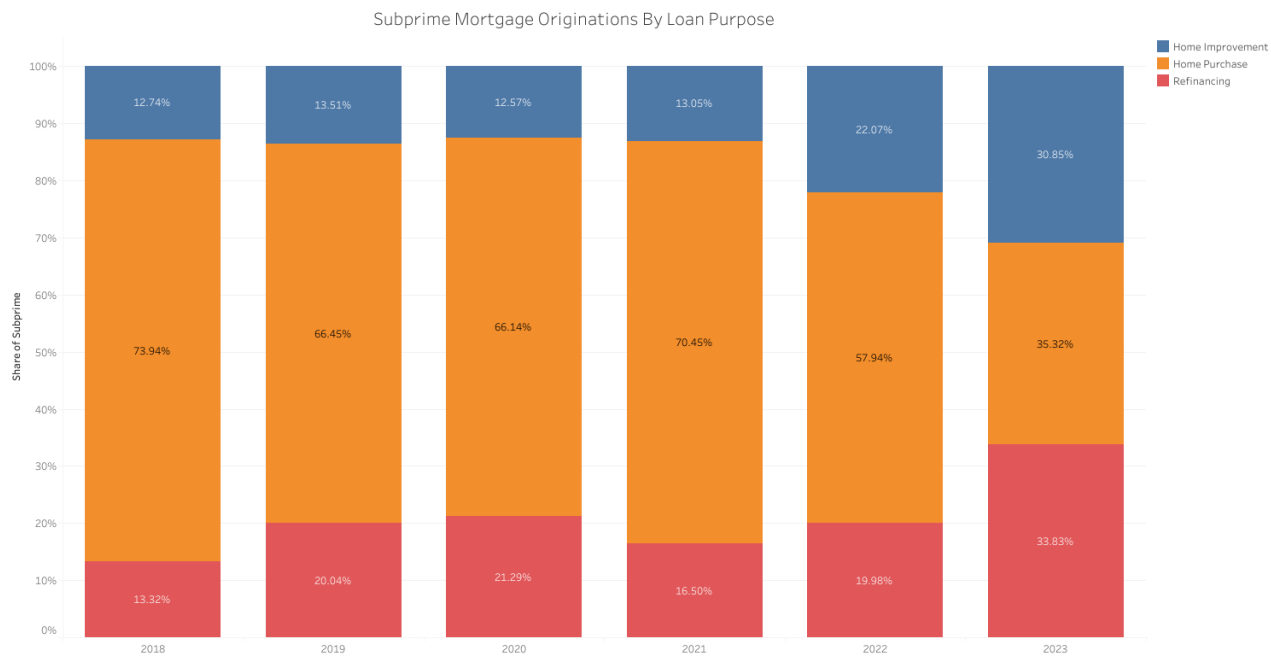
Subprime shares by loan recipient income group show that since 2018, income groups have diverged, with High-Income remaining much higher than other income groups.



Source: 2018-2023 HMDA

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Subprime loans have been characterized by growth in home improvements in recent years. As of 2023, the subprime are almost equally represented across all the categories.



Source: 2018-2023 HMDA

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### *Lending Practices Conclusion*

Mortgage lending activity in Clark County is consistent with many of the broader trends that have occurred in the wake of high inflation and high interest rates.

Further, Clark County exhibits slowing mortgage market fundamentals from the highs of 2020 and 2021 when the interest rates were lower and housing supply was low. Home purchase originations have decreased by 35% from 2022 and 2023, suggesting signs of declining housing demand and a slow housing market recovery within the county. Additionally, the share of refinance applications has reduced drastically. Debt-to-Income ratio and Credit History is the most common reason for denial across all income groups reflecting high inflation and stagnant wages, coupled with high interest rates.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Black and Hispanic applicants relative to White and Asian applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

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## CHAPTER 7: FAIR HOUSING STATUS

Federal fair housing laws prohibit discrimination in the sale, rental or lease of housing, and in negotiations for real property, based on race, color, religion, sex, national origin, familial status and disability. Oklahoma fair housing laws build on the federal laws, including age and pregnant women. Fair housing describes a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of their characteristics protected by the law or other arbitrary factors.

### Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

**Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)**, as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

**Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act.** In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

**Title VI of the Civil Rights Act of 1964.** Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

**Section 109 of the Housing and Community Development Act of 1974.** Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

**Title II of the Americans with Disabilities Act of 1990.** Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

**Architectural Barriers Act of 1968.** The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and usable by handicapped persons.

**Age Discrimination Act of 1975.** The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

**Title IX of the Education Amendments Act of 1972.** Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

## Fair Housing Related Presidential Executive Orders

**Executive Order 11063.** Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

**Executive Order 11246.** Executive Order 11246, issued in 1965 by President Lyndon B. Johnson was revoked by President Donald Trump in January 2025. The Executive Order, as amended, barred discrimination in federal employment because of race, color, religion, sex, or national origin for 60 years.

**Executive Order 12892.** Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

**Executive Order 12898.** Executive Order 12898, issued in 1994 by President Bill Clinton was revoked by President Donald Trump in January 2025. The order required that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

**Executive Order 13166.** Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

**Executive Order 13217.** Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

**Executive Order 13985** titled “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government” was enacted by President Joseph Biden in January 2021 and revoked by President Trump in January 2025. The order aimed to strengthen the federal government’s ability to address barriers to equal opportunity faced by underserved communities. The order further directs federal agencies to conduct equity assessments and identify systemic barriers to access faced by underserved communities. President Biden followed up on this Executive Order with a memorandum on Redressing Our Nation’s and the Federal Government’s History of Discriminatory Housing Practices and Policies. This Executive Action acknowledged that “... Federal, State, and local governments systematically implemented racially

discriminatory housing policies that contributed to segregated neighborhoods and inhibited equal opportunity and the chance to build wealth” for BIPOC (Black, Indigenous, and People of Color), and that those legacies of residential segregation and discrimination remain in existence today – from gaps in homeownership and wealth to environmental inequalities made worse by climate change. The memo outlines multiple ways in which the federal government’s discriminatory policies affected opportunities for safe and affordable housing, jobs, transportation, particularly for Black people. It also addresses the history of the federal government’s disinvestment in communities of color, despite the passage of the Fair Housing Act in 1968.

**Executive Order 13988**, issued by President Joseph Biden in January 2021 was revoked by President Donald Trump in January 2025. The order directed all federal agencies to review all policies which implement the non-discrimination protections on the basis of sex ordered by Title VII of the Civil Rights Act of 1964 (pursuant to the Supreme Court case *Bostock v. Clayton County*), Title IX of the Education Amendments of 1972, the Fair Housing Act and section 412 of the Immigration and Nationality Act of 1965 and to extend these protections to the categories of sexual orientation and gender identity.

## HUD Fair Housing Guidance

### ***Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records***

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD’s Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy. While it is impossible to know the precise number of people transitioning from a correctional facility at any one point in time, the ability to access safe, secure and affordable housing is critical for a formerly incarcerated person’s reintegration into society. HUD’s guidance is intended to eliminate barriers to securing housing for that population, and jurisdictions can assist by making a clear effort to eliminate any discriminatory barriers these individuals may face. For former inmates to avoid recidivism and work in society, they must have access to housing free of discrimination.

Further, for claims for refusing to make reasonable accommodations for people with disabilities, the HUD memorandum emphasizes that, when the disability of an applicant or tenant contributed to the past criminal conduct, the applicant or tenant may ask for an exception to the criminal background screening policy as a reasonable accommodation.

If the criminal conduct at issue arguably raises concerns about risk of harm to property or other residents, HUD explains that, as part of a reasonable accommodation request, the housing

provider should consider any mitigating circumstances that may reduce or eliminate the threat, such as engaging in treatment or therapy.

In April 2024, HUD issued proposed rulemaking to update existing screening regulations for applicants to HUD-assisted housing with conviction histories or a history of involvement with the criminal-legal system. Under current policy, public housing authorities (PHAs) and landlords of HUD-assisted housing have broad discretion in evaluating current and prospective tenants. As a result, some PHAs and landlords have created additional barriers for people with conviction and arrest records in need of stable housing. These barriers can make it exceedingly difficult – and, for some with conviction histories, impossible – to obtain housing. The proposed rule clarified that an arrest record alone may not be used as the basis for denying someone admission to HUD housing. However, an arrest record may be used in conjunction with other evidence of conduct to assess an applicant’s potential success as a tenant. This rulemaking was withdrawn in January 2025.

***Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity***

On September 21, 2016, HUD published a final rule entitled “Equal Access in Accordance with an Individual’s Gender Identity in CPD programs.” Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity for all HUD funded programs. This rule builds upon the 2012 final rule, “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity” (2012 Equal Access Rule). This final rule ensures that HUD’s housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Furthermore, as HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions with state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions without such protections. “

On January 25, 2021, President Biden signed an Executive Order requiring protections of LGBTQ people in housing, health care, and education. The Executive Order cites the recent Supreme Court decision, *Bostock v. Clayton County*, that held that the prohibition against sex discrimination in the Equal Employment Act prohibits discrimination on the basis of sexual

orientation and gender identity. The Executive Order requires the applicable federal agencies, including HUD, to promulgate actions consistent with Bostock and the various civil rights laws. This Executive Order, however, was rescinded by President Trump in 2025.

### **Supreme Court Ruling: Bostock v. Clayton County, GA (February 9, 2021):**

In *Bostock v. Clayton County, GA*, the U.S. Supreme Court expanded its interpretation of Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination. This law prohibits discrimination on the basis of sex, but not explicitly on the basis of sexual orientation or gender identity. The Court has determined in this decision that Title VII's protection of employees on the basis of sex also protects employees on the basis of sexual orientation and gender identity. Under *Bostock's* reasoning, laws that prohibit sex discrimination — including Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681 et seq.), the Fair Housing Act, as amended (42 U.S.C. 3601 et seq.), and section 412 of the Immigration and Nationality Act, as amended (8 U.S.C. 1522), along with their respective implementing regulations — prohibit discrimination on the basis of gender identity or sexual orientation, so long as the laws do not contain sufficient indications to the contrary. HUD's Office of General Counsel issued a memorandum explaining why the Fair Housing Act's prohibition on sex discrimination includes discrimination because of gender identity and sexual orientation and President Biden issued an Executive Order on Executive Order on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation in 2021.

### **Supreme Court Ruling: Texas Department of Housing and Community Affairs v. Inclusive Communities Project (June 25, 2015)**

On June 25, 2015, the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring “disparate impact” claims under the Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying or securing financing for housing. The case, *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, centered on the question of whether a policy or action has to be intentionally discriminatory, or merely have a discriminatory effect, in order to qualify as a valid basis for a discrimination claim under the Act.

*Inclusive Communities*, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. *Inclusive Communities* claimed that regardless of intention, the state's decision to fund tax-credit projects only in minority and poverty-laden neighborhoods resulted in segregation, and thus had a discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled against disparate impact claims that it would essentially “defang” the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

## State Overview

### Fair Housing Laws

Nevada’s fair housing law requires that all people in the State have equal opportunity to inherit, purchase, lease, rent, sell, hold and convey real property without discrimination, distinction or restriction because of race, religious creed, color, national origin, disability, sexual orientation, gender identity or expression, ancestry, familial status, or sex. This law adds ancestry to the federal protected classes, (NRS 118.020))

FEDERAL	CLASS	STATE
X	Race	X
X	Color	X
X	National Origin	X
X	Sex (including gender identity and sexual orientation)	X
X	Religion	X
X	Familial Status	X
X	Disability	X
	Ancestry	X

With respect to disability, the federal Fair Housing Amendments Act of 1988 (FHAA) puts a duty upon landlords to “make reasonable accommodations in rules, policies, practices, or services” to provide equal access to housing to a person with a disability. NRS 118.100 mirrors the federal anti-discrimination requirements. Landlords must grant the reasonable accommodation request even if the request results in a financial cost to the landlord. However, landlords are not required to grant the request if the financial cost will cause an “undue financial or administrative burden” on the landlord. Whether there is an undue burden is determined on a case-by-case basis.

## Fair Housing Complaints

### Structure

For questions about fair housing rights and responsibilities, or to file a housing discrimination complaint, the following agencies can provide information and/or complaint intake services. Note that you have up to one year after the last incident of discrimination to file an administrative complaint, and up to two years to file a court case.

**Silver State Fair Housing Council:** A private, nonprofit agency providing a comprehensive program of fair housing outreach, education, and enforcement services.

(888) 585-8634 toll-free/(702) 749-3288 Southern Nevada

Relay Nevada 711

Website: [www.ssfhc.org](http://www.ssfhc.org)

Email: [fairhousing@ssfhc.org](mailto:fairhousing@ssfhc.org)

**U.S. Department of Housing and Urban Development:** Regional Office in San Francisco Federal agency enforcing the federal Fair Housing Act; receives and investigates bona fide claims of housing discrimination.

(800) 347-3739

(415) 489-6564 TTY

Website: [www.portal.hud.gov/hudportal/HUD](http://www.portal.hud.gov/hudportal/HUD)

**Nevada Equal Rights Commission:** State agency enforcing state fair housing laws; receives and investigates bona fide claims of housing discrimination.

(702) 486-7161 Southern Nevada

NV Relay 711 or (800) 326-6868

Website: [www.nvdetr.org/nerc.htm](http://www.nvdetr.org/nerc.htm)

### Analysis

HUD maintains records of complaints that represent potential and actual violations of federal housing law. Over the 2019 through 2024 study period, HUD received 175 complaints alleging discrimination in Clark County. The majority of the complaints came from Las Vegas (72%), but North Las Vegas, Henderson, and Boulder City also received some complaints. Some complaints cited multiple bases for their claims. The table below shows the number of complaints filed each year from 2019 to 2024.

**Table: HUD Fair Housing Complaints - Number of complaints filed per year throughout the County**

Year	Number of Complaints Across County	Las Vegas	North Las Vegas	Henderson	Mesquite	Boulder City	Other Jurisdictions
2019	37	26	5	4	0	1	1
2020	38	29	1	8	0	0	0
2021	38	30	1	7	0	0	0
2022	22	16	1	2	0	1	2
2023	26	17	1	7	0	0	1
2024	14	8	1	3	0	1	1
<b>TOTAL</b>	<b>175</b>	<b>126</b>	<b>10</b>	<b>31</b>	<b>0</b>	<b>3</b>	<b>5</b>
<b>Percentage</b>	<b>100%</b>	<b>72%</b>	<b>5.7%</b>	<b>17.7%</b>	<b>0%</b>	<b>1.7%</b>	<b>2.9%</b>

The analysis further revealed that disability is the most cited base for complaints and was approximately 47.5% of the bases across all complaints. Retaliation follows and is cited at a rate of about 15.3%. Other bases cited include Race (12.4%), Sex (9.5%), National Origin (6.6%), Familial Status (6.2%), and Color (2.5%). The table below shows how many times each basis was cited in each year between 2019 and 2024.

**Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year across County**

Basis for Complaint	2019	2020	2021	2022	2023	2024	Total	Percentage
Disability	24	25	23	15	17	11	115	47.5%
Retaliation	8	7	9	7	4	2	37	15.3%
Familial Status	5	4	1	1	4	0	15	6.2%
Race	5	3	16	0	4	2	30	12.4%
National Origin	2	4	5	1	4	0	16	6.6%
Sex	4	9	3	4	1	2	23	9.5%
Color	2	1	2	0	1	0	6	2.5%
<b>Total Bases</b>	<b>50</b>	<b>53</b>	<b>59</b>	<b>28</b>	<b>35</b>	<b>17</b>	<b>242</b>	<b>100%</b>
<b>Total Complaints</b>	<b>37</b>	<b>38</b>	<b>38</b>	<b>22</b>	<b>26</b>	<b>14</b>	<b>175</b>	<b>--</b>

All 175 fair housing complaints filed between 2017 and 2024 were successfully closed. 40.6% of these complaints had no cause determination and 40% were successfully conciliated or settled. 7.6% resulted in the complainant refusing to cooperate, 5.7% were withdrawn by the complainant without resolution, and 4.6% were withdrawn by the complainant after resolution. There were 3 closure reasons that were cited to one complaint each – unable to locate complainant, election made to go to court and dismissed for lack of jurisdiction.



**Table: HUD Fair Housing Complaints – Closure reasons by year**

Closure Reason	2019	2020	2021	2022	2023	2024	Total	Percentage
Unable to locate complainant	0	0	0	0	0	1	1	0.6%
Complainant failed to cooperate	3	2	2	2	1	3	13	7.4%
No cause determination	17	14	23	8	6	3	71	40.6%
Complaint withdrawn by complainant after resolution	0	2	3	1	1	1	8	4.6%
Conciliation/Settlement successful	15	16	9	9	16	5	70	40.0%
Election made to go to court	0	1	0	0	0	0	1	0.6%
Dismissed for lack of jurisdiction	0	1	0	0	0	0	1	0.6%
Complaint withdrawn by complainant without resolution	2	2	0	2	2	2	10	5.7%
<b>Total Closures</b>	<b>37</b>	<b>38</b>	<b>38</b>	<b>22</b>	<b>26</b>	<b>14</b>	<b>175</b>	<b>100%</b>
<b>Total Complaints</b>	<b>37</b>	<b>38</b>	<b>38</b>	<b>22</b>	<b>26</b>	<b>14</b>	<b>175</b>	<b>--</b>

Breakdowns of the bases for complaints across the jurisdictions follows:

**Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year - Las Vegas**

Basis for Complaint	2019	2020	2021	2022	2023	2024	Total	Percentage
Disability	24	25	23	15	17	11	115	50.7%
Retaliation	5	4	6	4	1	2	22	9.7%
Familial Status	5	3	2	1	2	3	15	6.6%
Race	5	3	16	0	4	2	30	13.2%
National Origin	1	4	5	0	4	0	16	7.1%
Sex	4	9	3	4	1	2	23	10.1%
Color	2	1	2	0	1	0	6	2.6%
<b>Total Bases</b>	<b>46</b>	<b>49</b>	<b>57</b>	<b>24</b>	<b>30</b>	<b>20</b>	<b>227</b>	<b>100%</b>
<b>Total Complaints</b>	<b>37</b>	<b>38</b>	<b>38</b>	<b>22</b>	<b>26</b>	<b>14</b>	<b>126</b>	<b>--</b>

**Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year - North Las Vegas**

Basis for Complaint	2019	2020	2021	2022	2023	2024	Total	Percentage
Disability	3	1	0	1	0	1	6	50.0%
Retaliation	0	1	0	0	0	0	1	8.3%
Familial Status	3	0	0	0	0	0	3	25.0%
Race	0	0	1	0	1	0	2	16.7%
<b>Total Bases</b>	<b>6</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>12</b>	<b>100%</b>
<b>Total Complaints</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>10</b>	<b>--</b>

**Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year - Henderson**

Basis for Complaint	2019	2020	2021	2022	2023	2024	Total	Percentage
Disability	3	5	6	2	4	2	22	52.4%
Retaliation	1	0	1	2	1	0	5	11.9%
Familial Status	0	2	1	0	2	0	5	11.9%
Race	0	1	2	0	0	1	4	9.5%
National Origin	1	0	0	0	2	0	3	7.1%
Sex	0	0	0	0	1	1	2	4.8%
Color	0	0	1	0	0	0	1	2.4%
<b>Total Bases</b>	<b>5</b>	<b>8</b>	<b>11</b>	<b>4</b>	<b>10</b>	<b>4</b>	<b>42</b>	<b>100%</b>
<b>Total Complaints</b>	<b>4</b>	<b>8</b>	<b>7</b>	<b>2</b>	<b>7</b>	<b>3</b>	<b>31</b>	<b>--</b>

**Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year - Boulder City**

Basis for Complaint	2019	2020	2021	2022	2023	2024	Total	Percentage
Disability	1	0	0	1	0	1	3	50.0%
Retaliation	1	0	0	1	0	1	3	50.0%
<b>Total Bases</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>6</b>	<b>100%</b>
<b>Total Complaints</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>--</b>

## CHAPTER 8: COMMUNITY OUTREACH

### Organizations Consulted

<b>Organization</b>	<b>Consultation Type</b>
United Healthcare HPN	Community Meeting
The Just One Project	Community Meeting
City of Henderson	Community Meeting
Lutheran Social Services	Community Meeting
Nevada Housing Justice Alliance	Community Meeting
Nevada HAND	Community Meeting
RTC Transit	Community Meeting
Lived X	Community Meeting
S.A.F.E. House	Community Meeting
Nevada Homeless Alliance	Community Meeting
Silver State Fair Housing Council	Interview

### Regional Fair Housing and Equity Assessment Surveys

Clark County, Nevada conducted an online survey that was available to residents and other community stakeholders in both English and in Spanish. In addition to the survey being available online (using computers, smart phones, and other handheld devices), the survey was also made available to residents in a paper-based version. Access to the survey was provided through the Clark County and Regional AI participating cities' websites, through stakeholder email lists, posted in public convening locations, and published in print with QR Codes made available for residents to scan and link to the survey. Background on the Analysis of Impediments process and definitions of fair housing were provided in the survey introduction. The importance of community participation was also highlighted in the survey introduction.

There were two surveys titled "2024 Clark County Regional Fair Housing & Equity Assessments" that were prepared to collect responses. One survey was geared toward stakeholder organizations and the other survey was geared towards Clark County residents. Both surveys covered a range of topics including demographic information, residential information, knowledge of fair housing rights, experiences with fair housing discrimination, opinions on access to information on fair housing, and questions related to housing and community development. The stakeholder survey was comprised of 27 questions and the resident survey was comprised of 40 questions. The stakeholder survey received 40 responses, and the resident survey received 113 responses.

## Survey Results

Both surveys were made available from November 4<sup>th</sup>, 2024, through December 31<sup>st</sup>, 2024. The Resident Survey responses reveal significant concerns about housing affordability, discrimination, and accessibility in Clark County. Many respondents struggle with high rent costs, with 40% spending more than half their income on housing. A majority (65%) expressed a desire to move due to affordability, safety, and better job opportunities. Housing discrimination was a notable issue, with 27% reporting experiences of bias, primarily based on income, race, and disability. Awareness of fair housing laws was mixed, with many unsure of where to report violations. Residents also highlighted challenges related to transportation, accessibility for individuals with disabilities, and limited affordable housing options. While many support expanding fair housing protections, concerns about neighborhood changes and crime persist.

The Stakeholder Survey responses align with residents' concerns, particularly regarding rent affordability, eviction, and transportation accessibility. Many stakeholders noted significant barriers to fair housing, including discrimination by landlords, limited low-income housing, and resistance (NIMBYism) to affordable housing developments. A substantial portion (45%) reported witnessing housing discrimination, especially against low-income individuals and those with criminal backgrounds. While stakeholders generally understood fair housing laws, many felt enforcement was lacking. They called for stronger protections, more affordable housing, and better education for landlords and tenants. Stakeholders also emphasized the need for improved public transit and services to help marginalized populations access housing and employment opportunities.

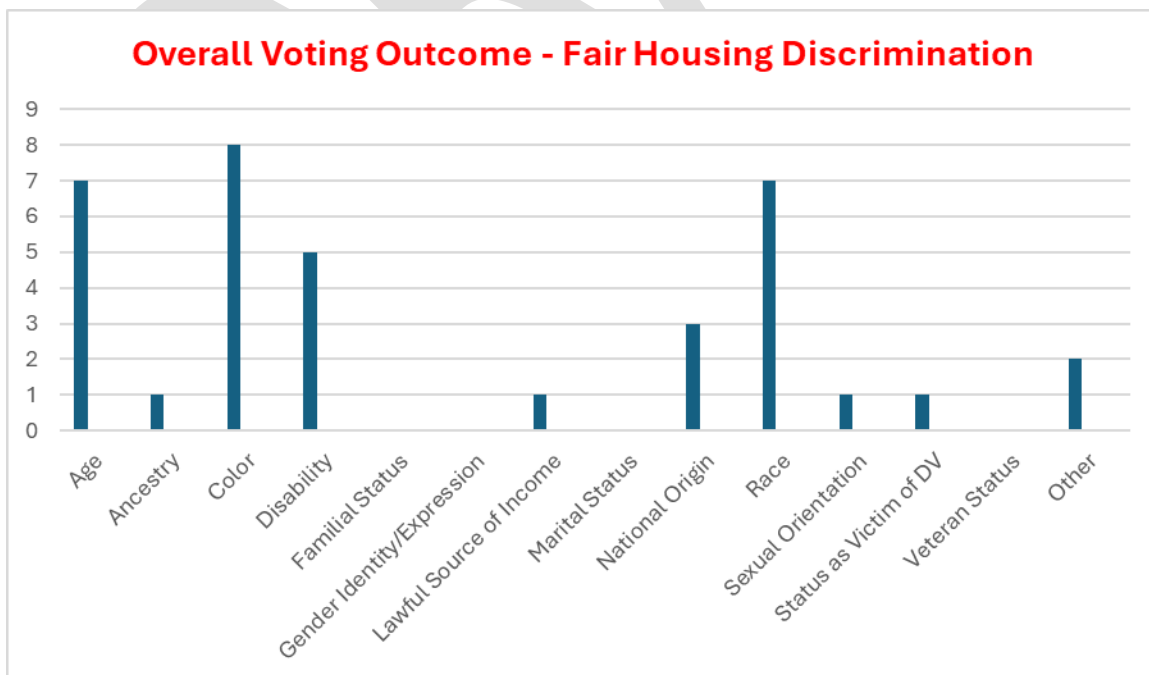
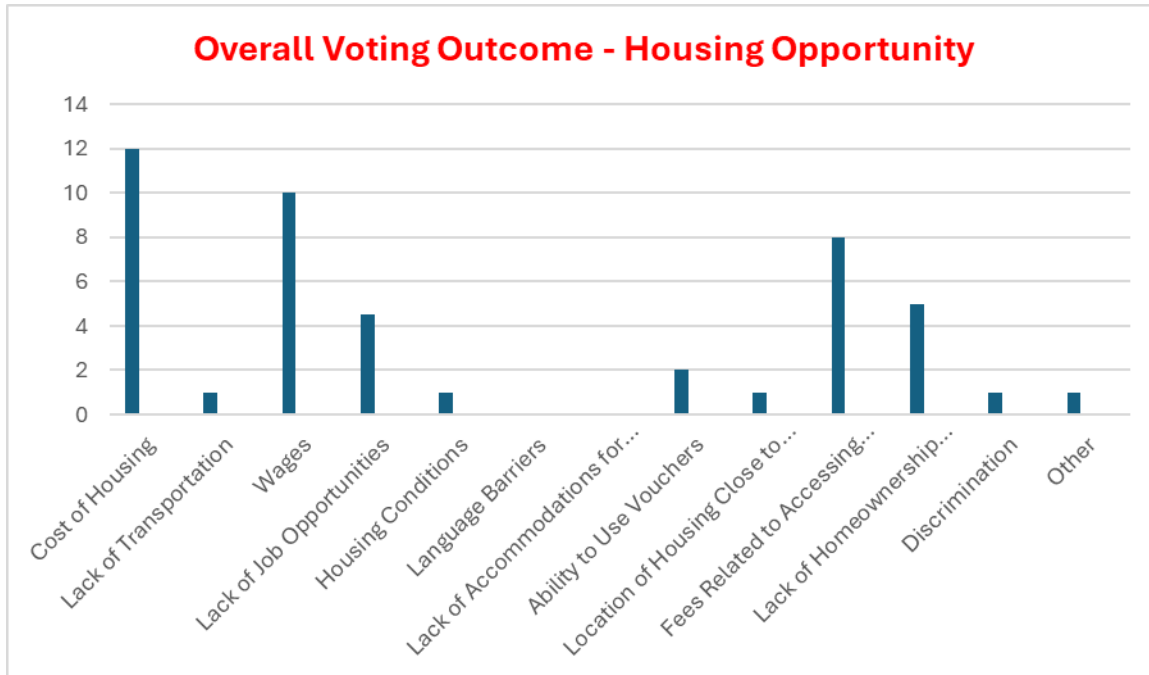
A summary of the survey responses by question is provided in the appendices.

## Community Meetings

Clark County, in partnership with the cities of Las Vegas, North Las Vegas, Henderson, Boulder City, and Mesquite, hosted four meetings on October 31, 2024, as part of the effort to update its Regional Fair Housing and Equity Assessment, a five-year plan addressing the region's greatest housing challenges. The goal of the meetings was to provide a forum for both the public and nonprofit/housing providers to discuss the challenges and impediments to fair housing faced by the community. These themes emerged during these meetings:

- Across all four meetings, the following were identified as the top causes for fair housing discrimination: color, race, age, and disability.
- Across all four meetings, the following were identified as the top impediments to fair housing opportunities: cost of housing, low wages, fees related to accessing housing (deposit, three months' rent, mandatory landlord fees), and lack of homeownership opportunities for low-income households.
- Other major themes of discussion included: discrimination faced by voucher holders, inadequate public transportation, and lack of assistance for the "missing middle" who do not qualify for assistance but do not make enough to pay market rate rent.

Meeting participants engaged in a prioritization exercise for both perceived barriers to housing and the top fair housing challenges. Results from all meetings were compiled and are displayed in the charts below. The cost of housing was the top voted barrier to housing. Wages and fees related to accessing housing were also noted as top concerns. Color was voted as the top perceived fair housing barrier. Age and race were also noted as top concerns.



## CHAPTER 9: FINDINGS, IMPEDIMENTS, AND ACTIONS

The purpose of fair housing planning and analysis is to foster a careful examination of the factors restricting fair housing choice. These factors are described throughout this report and are summarized in the list of findings below. After analyzing the findings, the jurisdictions established a list of impediments that are contributing to the fair housing conditions in the region.

HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices, or the availability of housing choices (and)
- Any actions, omissions, or decisions which have this effect.

Further, there are three components of an impediment:

- A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
- An impediment must have a disproportionate effect on a protected class.
- An impediment must be caused by an “action, omission or decision.”

Finally, jurisdictions have set forth actions it can take within its authority and resources to begin addressing the identified impediments.

### Findings

This AI includes a review of both public and private sector housing market contexts within the jurisdictions to identify practices or conditions that may operate to limit fair housing choice in the region. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the Southern Nevada residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, studies, complaints, and public involvement data. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available to residents, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice. Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes and confirm suspected findings from the contextual and supporting data.

The following findings were made.

## Demographics

- The population of Clark County has increased over 16% since 2010, outpacing the rate of growth in the State (around 15%) and the country (around 7%). The City of Las Vegas has grown by over 10%, North Las Vegas by nearly 22%, Henderson by over 23% and Mesquite by over 35%. Only Boulder City has decrease in population by around 1%.
- The Center for Business and Economic Research at the University of Nevada, Las Vegas predicts that Clark County will continue to see significant growth for the next 20 years. However, the growth rate will steadily decrease annually.
- Overall, the median age of the jurisdictions is increasing with the highest increases in median age in Mesquite and North Las Vegas.
- Since 2010, the non-White population has grown in every jurisdiction with the White population decreasing by about 8% since 2010. The City of Boulder City, which also has one of the oldest populations, has the most homogenous population, over 88% of the population is White. The City of North Las Vegas, which has been trending towards a younger population, is the most diverse with 61.9% of the population identifying as non-White.
- The fastest growing demographic is the Hispanic population, which has grown throughout the area. The number of Hispanic people in the County overall has grown by nearly 28% since 2010. It has grown by about 20% in Las Vegas, 32% in North Las Vegas, 58% in Henderson, 28% in Boulder City, and 43% in Mesquite.
- Since 2010, nearly every jurisdiction has seen the proportion of their population that is foreign-born grow. The population of foreign born has reduced in Boulder City. Henderson County has seen the largest growth in foreign born persons.
- The number of households who speak a language other than English at home is very similar to the number of foreign-born households. The most common language spoken at home is Spanish, which is spoken by 19.3% of households in Nevada. It is also relatively common for a household to speak an Asian or Pacific Islander language in Clark County.
- In Clark County, the disability rate by age is similar to the rate in the state, as a whole. Nearly 50% of residents over 75 years and over have a disability. This elderly population is likely on a fixed income and may need support to maintain or secure safe and stable housing.
- Since 2010, Nevada and the Clark County area have both seen median incomes rise, however, these increases are not keeping pace with rising home values and rents. Currently, the City of Henderson has the highest MHI by nearly \$14,000. Mesquite has had the most increase in MHI.
- The current poverty rate and change in poverty rate since 2000 varies between jurisdictions. The State's overall poverty rate in 2022 is 12.7%. Clark County's poverty rate is 13.4%. Las Vegas' poverty rate is 14.7%. NorthLas Vegas, Boulder City, Mesquite, and Henderson all have poverty rates below the County rate ranging from 11.9% down to 8.1%. The City of North Las Vegas' poverty rate grew by only 2%, however, they had the

highest poverty rate in 2000 and currently have the second highest. The City of Boulder City had the greatest increase in poverty rate (65.7%) but still maintains one of the lowest poverty rates in the area.

- White households across all jurisdictions have the lowest poverty rates while Black/African American and American Indian/Alaskan Native households have the highest.
- A noticeable difference is seen in the household composition across jurisdictions. The City of Mesquite has the lowest average household size at 2.25 while North Las Vegas has the highest at 3.31. This trend is due to the younger demographics in North Las Vegas, which may include families, while the older residents of Mesquite are less likely to have children still living at home. Across all jurisdictions, however, households are less likely to include children than they were in 2010
- For all jurisdictions compared, the homeownership rate has decreased since 2010 except for Boulder City and Mesquite. The City of Las Vegas has the highest rental rate at 45.2% while Mesquite has the lowest at 21.3%.
- Throughout Clark County, Black or African American and Native Hawaiian/Pacific Islander residents have lower homeownership rates than other racial or ethnic groups. White and Asian residents consistently have higher rates of homeownership. Mesquite stands out for the high homeownership rate among White residents and low rate among all other groups.

## Housing

- The most common housing type in Clark County is the 1-unit, detached structure and make up nearly 60% of the current housing stock.
- Although housing units with 5 rooms have decreased in percentage, the total number has increased since 2017 and is still the most common housing unit size in the county with 19.5%.
- 2018-2022 ACS data reports that only about 18.3% of all housing units in Clark County were built prior to 1980.
- 2-person households have remained the most common household size since 2000 and was 33.1% of households by 2023.
- The vacancy rate in Clark County saw a decrease of -8% between 2017 and 2023, following the approximately 6% increase seen between 2020 and 2017
- Clark County's median home value rose by 73.7% between 2017 and 2023.
  - North Las Vegas had the largest increase in median home value at 89.3%.
- Clark County's median contract rent rose by 56.4% between 2017 and 2023.
- 24.94% of homeowner households are cost burdened and 10.72% are severely cost burdened.
- 51.39% of renter households are cost burdened and 25.65% are severely cost burdened.

## Lending Analysis



- Between 2018 and 2023, loan applications peaked in 2021 with 292,296, up from 144,573 in 2018. Loan application rates trended downward from 2021 to their lowest levels in the five-year period in 2023 with 85,256 applications.
- Much of the year-to-year fluctuations in total originations that occurred between 2018 and 2023 were the result of refinancing originations. Refinancing was the dominant loan for all years examined with the exceptions of 2022 and 2023. Refinance loans grew significantly between 2018 and 2021 as interest rates were broadly low. In 2021 the US 30 YR conventional loans were around 3% and gradually increased to 7% in mid-2023.
- In 2023, 48% of applications were approved and 34% were denied. Primary reasons for denial included debt-to-income ratio (37%), Credit History (23%) and Collateral (13%).
- The largest applicant groups in 2023 for traditional home mortgages were Other Race (31%) and White (31%). Hispanic applicants represented 18% of the overall applicant pool. Black/African American applicants represented 6.7% of all home purchase applications. White applicants were least likely to be denied for conventional single-family home purchases at a rate of 17%, followed by Asian applicants at 21%. Black/African American and Hispanic applicant denial rate were highest at 23% respectively.
- Between 2018 and 2023, White and Asian applicants were less likely to be denied relative to Black and Hispanic applicants. Additionally, Black and Hispanic applicants were the most likely to be denied relative to other groups for all years analyzed. In addition to the overall denial rate, this pattern is evident in both home purchase and refinance loans, however, the widest differences were seen in home purchase loans.
- The denials across all income groups have risen since 2022 due to higher interest rates and stagnant wages. However, the percentage of denials by income group has risen more drastically for very low-income applicants (50% or less of Area Median Income). While the high-income group denial rate changed from 14.67% to 15.88% from 2022 to 2023, the very low-income group denial rate increased from 32.98% to 42.29%.
- Within Clark County, very low-income and low-income neighborhoods represent 19.87% of the County's total neighborhoods, although they are represented by approximately 4.66% of total originations and 7% of applications as of 2023. This suggests that low and very low-income neighborhoods within the County are less likely to participate in the single-family lending market relative to other neighborhoods.
- Across incomes, disparities can be seen in approvals by race. In 2023, the denial rate for high income Black applicants was 11.03% or roughly the same as that of low-income White applicants at 11.69% and moderate-income Asian applicants at 11.34%.
- As of 2023, the leading denial reason for all applicants across all income groups was Debt-to-Income Ratio and Credit History.
- Subprime loans have steadily increased between 2018 – 2023 with White and Hispanic loan seekers more likely to engage in the subprime lending market.

## Impediments and Actions

This update to the AI builds upon the previous studies, surveys and public input. It analyzes data and identifies the private and public sector conditions that foster housing discrimination and provides recommended actions to overcome the effects of the fair housing issues identified. Several of these actions address multiple impediments and linkages among them are noted.

It is the goal of the jurisdictions to undertake actions that can help reduce and eliminate existing housing discrimination and prevent its reemergence in the future, as well as to address other impediments to equal housing opportunity. While the jurisdictions cannot control systemic issues related to fair housing and fair housing choice challenges, they can work to coordinate actions that improve fair housing, encourage coordination among disparate public entities, encourage stakeholders to act and report on fair housing issues, analyze existing data sources, report progress on fair housing issues, highlight findings from data analyses, and encourage meaningful action and cooperation at community levels.

Given these constraints, the jurisdictions will undertake actions each year aimed at addressing fair access to housing and fairness of housing choices for the region's residents. These may include some of the actions outlined below, or other actions that may be subsequently identified as relevant and potentially effective in combating and eliminating impediments to fair housing choice. Specific activities that may support those actions are itemized as well.

**GOAL ONE: PROMOTE FAIR HOUSING ENFORCEMENT AND EDUCATION THROUGH INTERAGENCY COLLABORATION.**

**IMPEDIMENTS ADDRESSED:**

- *Barriers to accessing housing opportunities exist for those with credit history, eviction history, and criminal background concerns.*
- *Residents, homebuyers, and landlords have insufficient understanding of fair housing requirements and protections.*
- *Navigating resources and affordable housing options is challenging and prevents residents from accessing housing opportunities.*
- *Coordinated approaches are needed to address the housing affordability concerns in the County.*

**ACTION 1A:**

Continue to contract with housing service providers to educate home seekers, landlords, property managers, real estate agents, and lenders through trainings and material development regarding fair housing law and recommended practices, including the importance of reasonable accommodation under ADA, protections for protected classes, and the impact of using credit, criminal, and eviction history to assess tenant applications.

**ACTION 1B:**

Explore the creation of tenant advocacy materials that will provide easy to understand summaries of tenant rights and information on resources that can help with housing challenges including where to find housing assistance, where to report housing concerns, and how to manage background checks that may result in rental application rejection. These materials should be available in multiple languages as well as digitally and on paper for those who do not regularly access the internet.

**ACTION 1C:**

Seek ways to increase resident access to fair housing services, such as improved marketing of services, strategies for bringing opportunities into the community through partnership with service organizations and incorporating fair housing considerations as a routine practice of program administration.

## GOAL TWO: CONTINUE TO SUPPORT THE CREATION OF NEW AFFORDABLE HOUSING OPPORTUNITIES

### IMPEDIMENTS ADDRESSED:

- *The region lacks the number of affordable housing units needed to meet the demands of low to moderate income households.*
- *Increasing rent costs are pushing residents out of communities where they wish to live and where they have connections to support systems and opportunity.*
- *Property turnover is resulting in displacement of residents and high costs of housing leave few options for accessing new housing that is safe, decent, affordable, and near opportunity areas.*

### **ACTION 2A:**

Continue to encourage construction and rehabilitation of affordable housing throughout the region, for example through the use of public land and enhanced coordination with nonprofit developers.

### **ACTION 2B:**

Encourage landlords in high resource areas to market their available units to Housing Choice Voucher Holders through education, incentives, and interagency coordination that may help to streamline housing navigation.

### **ACTION 2C:**

Explore the promotion of new housing strategies to create new opportunities and enhance affordable housing preservation efforts, for example through the use of accessory dwelling units, adaptive reuse, employer-assisted housing, land trusts, etc.

### **ACTION 2D:**

Continue to provide and explore additional incentives for developers of affordable housing including incentives such as reduced fees, expedited processing, and regulatory streamlining.

### **ACTION 2E:**

Explore incentive opportunities for landlords willing to participate in affordable housing programs to expand available rental units.

**GOAL THREE: PROMOTE ASSISTANCE FOR THOSE FACING HOUSING INSTABILITY OR AT RISK OF HOMELESSNESS**

**IMPEDIMENTS ADDRESSED:**

- *Increasing rent costs are pushing residents out of communities where they wish to live and where they have connections to support systems and opportunity.*
- *Property turnover is resulting in displacement of residents and high costs of housing leave few options for accessing new housing that is safe, decent, affordable, and near opportunity areas.*
- *Eviction law in Nevada favors landlords and those who are evicted face greater challenges in securing new housing in the current market.*

**ACTION 3A:**

Explore ways to coordinate with local service providers to connect people at risk of eviction or displacement with services that stabilize housing.

**ACTION 3B:**

Monitor the status of affordable housing units at risk of conversion and work proactively with property owners to identify strategies that will allow units to remain affordable to prevent turnover and decrease in affordable housing stock.

**ACTION 3C:**

Explore expansion of programs that support low-income and senior homeowners in the maintenance of their homes and long-term sustainability of homeownership to avoid displacement, for example through programs that may include homeowner repair or assistance with mortgage payments, real estate taxes, homeownership association fees, and homeowner's insurance.

**ACTION 3D:**

Coordinate with the social service agencies and nonprofit partners to provide support for programs that provide tenant rental assistance, such as rent support, utility payments, and late fees, including for those facing the greatest housing instability (e.g. those on fixed incomes and those exiting facilities of care or incarceration.)

#### GOAL FOUR: EXPAND HOUSING OPPORTUNITIES FOR PEOPLE WITH SPECIAL NEEDS

**IMPEDIMENTS ADDRESSED:**

- *The region lacks the accessible units and supportive housing units needed to meet the demands of special needs households.*
- *Increasing rent costs have disparate impacts on special needs households that tend to have fixed incomes and fewer options for housing that accommodates their needs.*

**ACTION 4A:**

Provide accessibility improvements in rehabilitation activities to increase opportunities for people with physical disabilities to obtain and retain appropriate housing and live independently.

**ACTION 4B:**

Facilitate housing development and assistance programs for special needs households, including seniors, working families, persons with disabilities, and the unhoused.

#### GOAL FIVE: CONTINUE TO SUPPORT THE CREATION OF NEW AFFORDABLE HOUSING OPPORTUNITIES

**IMPEDIMENTS ADDRESSED:**

- *Lending patterns show that low-income communities and communities of color, even those with high incomes, are more likely to be rejected for home loans.*
- *Lack of economic mobility further intensifies increasing housing cost burden, particularly for renters.*

**ACTION 5A:**

Support activities that improve access to economic opportunities for low-income families and children.

**ACTION 5B:**

Provide services or support agencies that provide assistance to those exiting homelessness to increase housing and economic stability, for example through transportation assistance, assistance with accessing vital documents like identification, birth certificates, and social security cards, and the referral to community services that might include provision of job training and placement.

**ACTION 5C:**

Work with local lenders to encourage outreach to low-income communities and communities of color to facilitate education and counseling for homeownership opportunities.

**ACTION 5D:**

Provide funding for low-moderate income homebuyer programs, for example through new unit subsidies and downpayment assistance.

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